

RESPONSES TO COMMENTS AND LETTERS

1.

The first paragraph on page 24 of the draft RMP refers to maintaining wilderness objectives under the Existing Management Alternative. Wilderness values could not be maintained under existing management in the long term. Even though existing management direction in both Twin Coulee and the Pryor Mountain units has been directed toward preservation of wild land values, the alternative could not guarantee long-term maintenance of wilderness characteristics. If the lands were released to other than wilderness management, there is no assurance that existing wilderness values would not be negatively impacted.

2.

Final rulemaking for 43 Code of Federal Regulations (CFR) 3809.14 provides that:

"a properly filed notice affecting 5 acres or less and any plans of operations properly filed and approved, will constitute authorization for the use of off-road vehicles, avoiding the need to acquire separate authorization for such use."

Therefore, the BLM feels that a boundary adjustment would not be necessary.

3.

BLM could find no conclusive technical data regarding relative forage consumption rates of cattle and wild horses. It is generally agreed upon by knowledgeable persons that horses do consume more forage than cattle under similar conditions. The National Range Handbook published by the U.S. Department of Agriculture, July 13, 1976 recommends a 1.25 Animal Unit Equivalent for horses in part 802.1. Additionally, the National Academy of Sciences, Final Report (1983) on Wild and Free Roaming Horses and Burros states on page 28, paragraph 2:

"Although some need further research, results from this study carry potentially important implications for wild horse management. Findings on consumption rates add support to the practice noted in the Phase I Report (see page 97) of attributing an animal unit equivalent of 1.25 to mature horses. Although this value appears high in light of the current Colorado results (i.e., an average 14 percent greater forage consumption by mares), unreported evidence suggested that the 14% difference was conservative (L. R. Rittenhouse, personal communication, 1982). The difference appeared to hold over a fairly wide range of forage quality conditions."

4.

One objective of this alternative is to strive for a sex ratio approaching 50-50. This would slow the reproductive rate as you point out. However, sex ratio is only one criterion used in determining which horses are to be removed. Conformation, color, and other characteristics that typify the Pryor Mountain wild horses will also be considered. Due to the isolated nature of this horse herd, it is necessary to be selective when removing

horses or the concentration and/or elimination of a certain gene pool could occur, thus contributing to the problems you point out. The BLM's selection criteria is designed to minimize these problems.

5.

The high level alternative would involve considerable manipulation of the wild horses. This alternative would provide for the most rapid response in improving the vegetative condition, thus potentially increasing the number of horses the PMWHR could support. However, due to the unacceptable impacts to the wild horses as outlined on page 149 of the draft RMP/EIS, this alternative was not chosen as a preferred course of action.

6.

A reference to long-term significant impacts on wild horse management as a result of wilderness designation was made in the third paragraph on page 160 of the draft RMP/EIS. This reference to impacts was overstated. The BLM's Preferred Level Management Alternative recommends wilderness designation for the Pryor Mountain and Burnt Timber Canyon units. The only potential impacts on wild horse management would be the location and type of new range developments which might be allowed. Any such facilities would have to be installed so as not to impair wilderness characteristics. In reality, the Preferred Level Management Alternative would ensure continuation of a healthy wild horse herd, which BLM construes as a major supplemental value of wilderness.

7.

See Response #6.

8.

The BLM agrees that wild horse management in conjunction with wilderness management is compatible and that the two management themes should, in fact, enhance one another.

9.

The proposed fences would include a 2 mile wing fence in the Britton Springs area and the remaining 5 miles would be located along the south boundary of the horse range between Britton and Sykes Springs. The wing fence would help facilitate capture operations. The intent is to reduce the time and cost of capture and, hopefully, reduce some of the stress the horses are potentially subjected to during capture operations. The south boundary fence is needed to keep the wild horses from drifting onto private lands along Crooked Creek as well as to keep them off the county road to reduce the potential of injury from vehicles.

Costs of the fences are displayed in Appendix 2.1, final RMP/EIS.

10.

The water catchments are needed to improve distribution of the horses by increasing the availability of water. They can be used to selectively influence the areas the horses use during various times of the year. Areas that traditionally receive heavy use adjacent to water sources are provided some relief by fencing off the water, thus forcing the horses to other areas. This method would subject the horses to very little stress while improving range condition through deferment of selected areas.

11.

To assure that non-public lands remain available to wild horses, the United States should acquire 1,560 acres from the State of Montana, and 680 acres of privately-owned land presently being utilized by the wild horses (see Map 1—Map Pocket). The State of Montana supports BLM's efforts to consolidate their land holdings within the Pryor Mountain Wild Horse Range (PMWHR) to facilitate management of the area. The Department of State Lands has listed for possible exchange, the State Trust Lands within the PMWHR.

12.

To date, no special budget allocation has been authorized for the Land Tenure Adjustment Program. Therefore, all work months and other costs associated with the program have been charged to the general Lands program. Without a separate project code to charge against, it is impossible to separate out the costs that are strictly related to Land Tenure Adjustment.

13.

There are certain administrative costs associated with management of "isolated" parcels. For example, a grazing authorization and bill is issued annually. Also, any proposed action affecting these parcels (rights-of-way, range improvements, etc.) must be processed and evaluated before authorization.

14.

Section 203 of the Federal Land Policy and Management Act (FLPMA) provides for three types of land sales—open competitive bidding, modified competitive bidding, and direct noncompetitive sales. A decision on the method of sale and a determination of whether any individual will receive preference in the sale is made on a case-by-case basis, and takes into account such factors as the size and location of the parcel, public access, adjacent landowners and land uses, and other pertinent information appropriate to the case. In addition, land sales and exchanges are subject to valid existing rights at the time of disposal.

15.

The BLM's Proposed Action for land tenure adjustment (High Level Management) states that priority consideration would be given to land exchange proposals which facilitate improved public land management, provide for acquisition of desirable fish and wildlife habitat, provide public access, recreation opportunities or may expedite

future mineral development (see Proposed Action for Land Tenure Adjustment, Chapter 2, final environmental impact statement (FEIS)).

Also, see discussion of the Environmental Assessment/Land Report (EA/LR) process in the Proposed Action Section for Land Tenure Adjustment.

16.

During the public participation and scoping process, 13 issues were identified within the Billings Resource Area. To adequately address these issues, formulate alternatives and assess the impacts of each alternative, and consistently follow a set of regulations and procedures, a detailed and complex document is necessary. This RMP was not developed to confuse the public, but rather to provide the land manager a means to anticipate, and plan for, the future public needs from the BLM lands in the Billings Resource Area.

17.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

18.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

19.

Surveys, as such, are prohibited by the Office of Management and Budget. To undertake one would be extremely costly and time-consuming. However, in accordance with the general provisions of Section 202(f) of FLPMA and more specifically the requirements of 43 CFR 1610.2(e), the BLM provides a 90 day comment period following publication of the draft EIS during which time, persons who wish to comment on any aspect of the land use plan are provided a means for that expression. In addition, prior to any specific land sale or exchange, BLM regulations provide for a 45 day comment period (refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS).

20.

Refer to Response #16.

21.

The BLM is not considering a jurisdictional transfer of the southern portion of the Big Horn Tack-On to the National Park Service. This area is an integral portion of the designated PMWHR. The BLM is the lead agency for wild horse management in the Pryor Mountains. The road which forms the western boundary of the Big Horn Tack-On is essential to the future management of the horse range by providing access to artificial water sources which require periodic maintenance and wild horse traps.

22.

Refer to the Proposed Action for Final Wilderness Suitability Recommendations and Rationale in Chapter 2, FEIS.

23.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

24.

The BLM recognizes that in many cases, relatively small, isolated tracts of native vegetation do provide a much needed and valuable wildlife habitat resource. In reference to the site north on Highway 87 (Tract 58R), our initial evaluation of the site identified the area as being used yearlong by pronghorn antelope for feeding and bedding purposes. We also identified active sage grouse dancing grounds on and adjacent to the parcel and evidence of use by sharptail grouse was noted. It was also recognized that the parcel receives use by both recreationists and wildlife interest groups. Unfortunately, the area is also frequently abused by target shooters and other publics scattering and dumping garbage. Numerous antelope and sage grouse carcasses have also been found throughout the area. This creates not only an eyesore, but poses the potential for a serious safety hazard. A signing program was initiated asking for public support in keeping the area clean with no favorable results.

It is because of the obvious resource values and heavy public use that we have proposed to retain the tract. However, we also recognize its potential for exchange with other lands with equal or greater wildlife and recreational values if such an action would provide an area which could be managed more cost effectively and still be of high value to the public.

25.

The intent of paragraph 6, page 4 is to alert the reader that not all elements of the wildlife program would be discussed in detail. Much of the day-to-day coordination and environmental assessment activities required by law will not be changed through the planning process. Additionally, small habitat improvements, some of which were mentioned, have no significant impact on other programs and were therefore not considered an issue requiring extensive analysis.

26.

Refer to Issues Considered in Land Use Plan Alternatives, Land Tenure Adjustment, Chapter 1, FEIS.

27.

The BLM Montana State Office maintains a staff of certified land appraisers who determine, on an individual basis, the fair market value of a particular tract using recognized appraisal methods and standards. The appraised fair market value of that tract of land then becomes the lowest acceptable bid at a public land sale.

28.

Refer to Response #14.

29.

Any coal exchanges that might occur would be examined on a case-by-case basis. Where checkerboard coal ownership occurs, it may be in the public interest to acquire minerals ownership so that a lease can be offered as a whole. This increases the competitiveness of a tract as a bidder has to deal with only one mineral owner. It is beyond the scope of this document to determine if Burlington Northern would receive unfair economic advantage from a coal exchange.

30.

Refer to Response #16.

31.

The BLM is not certain where the figure of 3,242 acres came from. Under the given scenario of a 300,000 ton/year surface mine in the Bull Mountains, 357 acres would be disturbed over the next 25 years (3 acres/year short term, 18 acres/year long term).

The BLM cannot locate this speculative mine on a map at this time. There are too many variables for a mining company to consider, and no leases have been analyzed or offered.

These 9,535 acres (9,360 acres as amended in this document) are described as suitable for further consideration for leasing pending application of the wildlife and cultural coal unsuitability criteria. During the activity planning phase which follows the completion of this RMP, lease tracts may be nominated by industry in a "Call for Expression of Interest" or the Powder River Regional Coal Team may decide to delineate a tract for competitive lease offering. The maps and text have been changed to clarify the coal planning process in the final RMP/EIS (see Coal Alternatives, Chapter 2, final EIS).

32.

Landowner response was considered to be significant when contiguous sections of Federal coal were affected by negative surface owner views. In the Bull Mountains, where small operations have historically operated, one section of coal could support a projected 300,000 ton a year mine for approximately 38 years.

Maps have been provided which specifically display the 9,360 acres suitable for further consideration for surface coal leasing (see Coal Alternatives, Chapter 2, FEIS). Please note that additional acreage was eliminated from further consideration when significant negative landowner response blocked out large portions of the area. The acreage figure here has changed from the 9,535 acres given in the draft EIS. This is due to the fact that leases are issued by legal subdivision. The figure does not affect the total tonnage of coal available.

33.

Consolidation Coal Company does not meet the definition of a qualified surface owner as defined in Sec. 714 of Surface Mining Control and Reclamation Act (SMCRA).

34.

It is true that construction of a rail spur into the Bull Mountains could cause environmental and social/economic impacts. However, these impacts were only discussed in a general manner, since there is no way to predict when or where a rail spur might be built. Specific impacts would be discussed in the evaluation of a mine plan.

35.

Hauling of coal by truck is only an efficient method of transportation when tonnages produced are fairly small (250,000 ton/year), and the distance the coal is moved is small.

Should a mining company select this option to get the coal to market, it would have to build new roads or upgrade existing roads. Fencing these roads off would be a practical method to safeguard livestock. With the tonnages anticipated in the hypothetical scenario given (300,000 ton/year at maximum capacity) trucks probably would not be mining night and day.

36.

Analysis of probable impacts indicate that coal mining at the levels projected in the two scenarios would not result in significant impacts to wildlife or other resources. The BLM could not, therefore, eliminate more land from further consideration due to anticipated multiple use resource conflicts.

Current research indicates long-term impacts to groundwater quantities and quality would not be significant, except in proximity to mined areas. State and Federal regulations require a mining company to replace water sources that are lost.

Federal and state regulations require that surface mined areas be returned to productivity. A mining plan would not be approved unless there is a reasonable probability that the lands may be reclaimed.

37.

A site-specific lands report and environmental assessment must be completed prior to any public lands being sold or exchanged. Lessee dependency on public lands will be closely examined. It is extremely unlikely that any public lands would be disposed of if such a transaction would create an economic hardship for the lessee.

38.

Refer to the Proposed Action for Land Tenure Adjustment, Chapter 2, FEIS.

39.

Refer to the Proposed Action for Final Wilderness Suitability Recommendations and Rationale, Chapter 2, FEIS.

40.

The Tillett Ridge Road is essential for wild horse management purposes and also provides recreational access. The joint land use decisions of the Forest Service and BLM dated May 23, 1974, page 32, states "Vehicle access will be limited to the designated system of roads. Within PMWHR, vehicle access will be limited to the Tillett Ridge Road and the Sykes Ridge Road. All other roads will be closed."

41.

Refer to the Proposed Action for Final Wilderness Suitability Recommendations and Rationale, Chapter 2, FEIS.

42.

Cliffs are just one of many special habitat features which receive an intensive wildlife evaluation prior to any disposal or exchange action. This evaluation would identify any current use such as nesting raptors and would also predict future potential significance to the wildlife resource. A survey by the Montana Department of Fish, Wildlife and Parks (MDFWP) would also be requested.

43.

Refer to the last sentence of Response #14.

44.

The BLM plans are not permanent documents. Public opinions change, demands upon resources change, and government programs change.

The adoption of the new "Coal Management Program" by the Secretary of the Interior in 1979 required the BLM to evaluate the coal resource under new areas are acceptable for further consideration for leasing. Coal development remains an important issue, both locally and nationally.

45.

Recoverable coal in the Bull Mountain Field is admittedly less than that of eastern Montana coal fields. The coal beds are thinner and overburden increases more rapidly in the Bull Mountains than in eastern Montana coal fields. However, the quality of the coal in the Bulls is somewhat higher than the subbituminous coals of Big Horn County, and has significantly higher BTU values than the lignites of eastern Montana.

46.

Seventeen thousand and seven hundred tons per acre was derived by averaging the measured thickness of the coal beds across the field, and multiplying this figure by 1,771 tons per acre/foot, the average density of subbituminous coal. Obviously, this is coal in place. Actual recoverable usable coal will be lower.

Consolidation Coal Co. opened its test pit at a location where the Mammoth-Rehder Coal Bed is thinnest.

47.

Current recovery ratios are based on the depth a company can surface mine and still produce profit. In the Powder River Coal Production Region (subbituminous coal) average ratios are 4 to 1 for West Decker and 5 to 1 for Western Energy. In the Fort Union Coal Production Region (lignite coal) a company may go to a 10 to 1 ratio if the coal is being transported to an onsite power plant and no shipping costs are involved. In the Bull Mountains, the Divide Mine is currently operating at approximately a 7.5 to 1 ratio.

Actual area damaged by recovery of Mammoth-Rehder Bed is similar to other operating mines given its higher quality.

48.

Refer to Response #44.

49.

Refer to the Proposed Action for Land Tenure Adjustment, Chapter 2, FEIS.

50.

Refer to Response #15.

51.

Refer to the Proposed Action for Final Wilderness suitability recommendations and rationale, Chapter 2, FEIS.

52.

None of the areas recommended as suitable for wilderness designation in the BLM's preferred alternative contain grazing permits. Of those areas recommended non-suitable in the draft, only Twin Coulee contains commercial livestock grazing. The leased area encompasses 600 acres near the eastern boundary of the wilderness study area (WSA).

53.

While the potential for oil shale reserves was a consideration for the non-suitable recommendation for Twin Coulee, it was not the sole reason. The resource value of Twin Coulee for small scale commercial logging, BLM's determination that the area does not contain outstanding recreational opportunities and the fact that the area would not add diversity or uniqueness to the National Wilderness System were all considerations in the recommendation.

The BLM, by law, must reexamine all resource values in WSAs, since development of these resources may conflict with wilderness designation. Mineral resource potential must be evaluated to determine what values might be foregone should an area be designated wilderness.

Heath "oil shales" may be found in the vicinity of the Twin Coulee WSA; they do not lie within the WSA. Refer to Proposed Action for Wilderness final decision rationale, Chapter 2, FEIS.

The Twin Coulee WSA would, upon designation, be essentially closed to mineral development. The only mining claims located within that WSA were located after passage of FLPMA, and therefore, mining claimants may not impair wilderness suitability.

Mining ventures have always been sensitive to market values and costs of mining. A recent report by the Montana Bureau of Mines and Geology states that mining the "oil shale" bed of the Heath Formation is presently not profitable, when mineral and syncrude values are weighed against probable mining costs.

54.

The Pryor Mountain WSA and a portion of the Burnt Timber Canyon Wilderness Study Unit (WSU) have been recommended for wilderness designation. Refer to the Proposed Action for final wilderness suitability recommendations and rationale, Chapter 2, FEIS.

Response #40 of the Billings Public Hearing transcript addresses the need for the Tillett Ridge Road which serves as the boundary between the Burnt Timber Canyon and Pryor Mountain areas.

55.

The wilderness suitability decision for the Big Horn Tack-On has been modified in the final RMP/EIS. Refer to the Proposed Action for Wilderness decisions and rationale, Chapter 2, FEIS.

56.

The methodology used in arriving at a stocking rate for the PMWHR is displayed in Appendices 2.9 and 2.10, of the FEIS. The proposed action selected a target number of horses and course of action that the BLM believes will result in maintaining a viable horse herd and improving range conditions on the horse range.

57.

Refer to Response #44.

58.

The BLM is not aware of any regulations concerning noise nuisance on non-wilderness public lands. The BLM has formally closed a 70 acre area adjacent to the housing subdivision to serve as a buffer between the homes and the off-road vehicle (ORV) use area. The BLM is also planning to close the entire 1,200 acre area to 4-wheeled vehicles. Refer to the Proposed Action for ORV Use, Chapter 2, FEIS. The 1,200 acre area would remain open to motorcycle use, however.

The ORV use in the South Hills has existed for some time and predates the subdivision of neighboring privately-owned land. There are no "easy fixes" where ORV use and neighboring landowner objections to that use occur. The BLM feels that use impacts are within acceptable levels based on soil characteristics, vegetative conditions and other use demands.

59.

Administration of the proposed partial closures will depend to a great degree on available manpower and funds. Every effort to administer these closures will be made within fiscal constraints including, but not limited to, public affairs efforts, site inspections and signing. The BLM will continue to work with both the users and the local landowners.

60.

Local law enforcement officials do not have enforcement jurisdiction on Federally administered lands, but can serve as witnesses just as any private citizen does. The BLM does have one Federal law enforcement official on call in the Billings area.

The additional closure of the South Hills to 4-wheeled vehicles is being proposed, in part, to reduce enforcement problems.

61.

Refer to Response #58.

62.

Refer to Response #59.

63.

In 1980, the Cedar Park Homeowners' Association agreed to maintain the west boundary fence. This agreement has remained in effect. During the last 3 years, BLM estimates that approximately 150 hours have been spent repairing the fence in question, by BLM personnel.

64.

Since its inception, the BLM has had the authority to sell or exchange land. In 1976, the passage of the FLPMA reaffirmed that authority. In addition, it provided for public comment periods prior to any land sale or exchange.

The process the Bureau uses is clearly spelled out in FLPMA and the Code of Federal Regulations. These allow for a 90 day comment period for persons wishing to respond to a public land use plan, and in addition, the public is invited to comment on any specific land sale or exchange for a 45 day period prior to that transaction.

65.

The U.S. Congress regulates how the monies raised from public land sales are distributed. The funds are distributed as follows:

- 76%—Reclamation Fund
- 20%—General Treasury Fund
- 4%—State

Any change in how the funds are distributed would require Congressional action.

The Reclamation Fund consists of dedicated monies used by the U.S. Bureau of Reclamation for reclamation project purposes. Therefore, under current law, only 20% of funds (General Treasury) derived from public land sales would be available for application against the national debt. Current Administration policy is not to promote public land sales in order to retire the national debt.

66.

The BLM does sign major access routes to well-blocked public lands. Many of the public lands in Montana are small isolated parcels and a signing program to identify all BLM tracts would therefore be impractical. Some parcels are surrounded by privately-owned lands and access to the public lands are at the discretion of the private landowner.

67.

Refer to Responses #14 and #27.

68.

Refer to Response #44.

69.

The wilderness alternatives presented are not tailored to fit a particular management philosophy, but are levels of analysis that best fit under a management theme for analysis purposes.

Alternative or management themes which reflect the commonality under which resource activities are discussed by alternative are expressed under each major alternative heading in Chapter 2, FEIS.

The approach used in the Billings RMP for structuring wilderness alternatives also reflects the BLM's Wilderness Study Policy in that at least the following alternatives for wilderness suitability are to be analyzed:

1. All Wilderness—An alternative which analyzes the environmental, social and economic impacts of including all areas under wilderness study for inclusion within the National Wilderness Preservation System (NWPS).
2. No Wilderness—An alternative which recommends that none of the areas under wilderness study be recommended for wilderness designation.

70.

Refer to the Proposed Action for Wilderness for the final wilderness suitability recommendation and rationale for the Big Horn Tack-On, Chapter 2, FEIS.

71.

The word "median" has been deleted from the final RMP. The Bureau recognizes its obligation to other agencies and landowners within the area used by the horses and the adverse consequences a widely fluctuating horse population would have on other resources. Refer to Response #342.

72.

This has been reworded to reflect your concern in the final RMP/EIS.

73.

The PMWHR is considered "sensitive" to oil and gas leasing. Should the Billings Resource Area receive an application for a lease within the horse range, a site-specific environmental assessment to develop appropriate stipulations for the protection of wild horses, fragile habitat and visual resources, would be performed. Since directional drilling would not be feasible, no leasing would be recommended for the "core" of large areas for which no surface occupancy is stipulated.

National Natural Landmarks are, of course, considered sensitive areas. The BLM will add the Bridger Fossil area and Cloverly Formation Site to its list. (The Crooked Creek Fossil area lies within the larger PMWHR sensitive area.)

Cultural sites are protected from destruction by oil and gas operators through a standard stipulation attached to all leases. This stipulation requires an inventory or clearance before exploration may ensue. All cultural sites would be avoided.

The 43 CFR 3809 (surface management of unpatented mining claims) regulations do not specifically address paleontological sites, though they do require inventory and avoidance or salvage of significant cultural sites. The BLM would work with an operator or claimant to ensure protection for sites, through avoidance of valuable sites.

74.

The BLM appreciates receiving the complete list of designated and potential National Natural Landmark sites within the Billings Resource Area. Those sites which occur on BLM administered lands in this resource area have been added to the sensitive areas listing and overlay in the final RMP/EIS. See the Appendices section for a list and the "Sensitive Areas" Map Overlay in the Map Pocket. The ecological/geological features of these areas will be protected by the addition of protective lease stipulations when necessary.

75.

This correction has been made in the final RMP/EIS.

76.

This classification has been noted under Soils/Watershed, Chapter 3, FEIS.

77.

Refer to Response #84.

78.

The BLM is in agreement. See Proposed Action for Wilderness, Chapter 2, FEIS.

79.

The sentence "This would be viewed as a median to be maintained over the short term (8 years)" has been deleted in the final RMP/EIS. A yearly wild horse excessing program is essential in maintaining a viable horse herd and improving range condition, and the BLM will attempt to maintain the target allocation of 121 head of horses.

80.

The BLM agrees with your comment. This has been restated in the final RMP/EIS.

81.

Seventy thousand acres within the Billings Resource Area, of which 36,600 acres are part of the designated PMWHR, have been identified "sensitive" to oil and gas leasing. Lease applications within these areas would be routed to the resource area for application of appropriate special stipulations. Assessment may determine, especially within the PMWHR, that some areas are unsuitable for oil and gas exploration and subsequent development. Where "no surface occupancy" is recommended for an area over 1/2 mile from an area which may be occupied, the resource area would instead recommend no leasing (since directional drilling could not tap a possible reservoir under that land). Occupancy in other areas may be severely restricted.

82.

An inventory to identify historic or prehistoric sites or features would be conducted in areas proposed for any surface disturbing project. If cultural resources significant enough to be eligible to, or listed on, the National Register of Historic Places are encountered, the project may be relocated or the impact to the remains may be mitigated according to current standards established by the Advisory Council on Historic Preservation (1980).

83.

This has been corrected in the FEIS.

84.

The BLM acknowledges that this 160 acre parcel is NPS land, but due to printing cost, it is not feasible to correct this map.

85.

Changes have been made in the FEIS to reflect these concerns. (Refer to Threatened and Endangered Species, Chapter 3, and Responsibilities Common to All Alternatives, Chapter 1).

86.

Specific tracts have not been identified along the Yellowstone River for acquisition purposes. The draft RMP was used as a means of expressing BLM's interest in such acquisition through land exchanges. If acquisition opportunities are presented to the BLM, a EA/LR is completed at that time. This action requires that a 45 day public comment period occurs. Consultation with the U.S. Fish and Wildlife Service (USFWS) can occur during this time period.

87.

Refer to Response #85.

88.

Refer to Response #85.

89.

The BLM will not issue coal leases through this planning document. However, this office is recommending that certain areas either are or are not suitable for further consideration for leasing pending further study and full application of the unsuitability criteria. Unsuitability criterion 7 and 9-15 were not applied at this planning level due to lack of adequate inventories. See the Appendices section (FEIS) for a listing of available data and data to be collected. Inventory efforts will be initiated in FY-84 if funding is available.

90.

Refer to Response #89.

91.

There are no areas currently in native vegetation that are being considered for conversion to crested wheat pastures. All these areas are either composed of old, stagnant monotypic stands or intermixed with undesirable species such as snakeweed and red three awn.

The objective is not to create a monotypic situation, but to reintroduce a diversity of plant species to improve livestock forage as well as wildlife habitat. The BLM feels that this type of vegetative treatment does not conflict with multiple use concepts of management but, in fact, enhances the overall quality of the environment by providing diversity for wildlife while deferring domestic livestock on native range. Additional fences may be required to confine use to these areas.

Livestock use would not be authorized at a continuous high level that would eventually reduce the pasture to a monotypic situation. Wildlife objectives would be maintained as well as other multiple use objectives.

The 1,700 acres of native range to be renovated would be reseeded to native species or if an adequate seed source of desirable plants were available the area would naturally revegetate.

92.

Refer to "Methodology for Controlled Burns," Appendices section, FEIS.

93.

The assessment of condition of all 41 miles of identified woody floodplain vegetation has not been completed. Please refer to Response #6 for an explanation of our ongoing efforts to update existing allotment management plans (many of which fall in the "M" and "C" range categories) and BLM's approach to the development of new allotment management plans (AMPs) which ensures inclusion of specific wildlife habitat management objectives.

94.

Until the allotment specific evaluations are completed as outlined in Response #160, we cannot accurately identify our short- and long-term objectives which BLM will be striving for on an allotment basis. The objectives will, however, include specific treatment proposals for the protection and enhancement of all wetland, riparian and woody floodplain habitat types.

95.

Refer to the Proposed Action for Land Tenure Adjustment and Recreational Access in Chapter 2, FEIS.

96.

Refer to Response #169.

97.

The proposed action does propose considerable treatments and range improvements for the "M" and "C" allotments. However, they are at a lower priority since the problems or conflicts identified were not as serious as those in the "I" allotments.

Reductions in animal unit months (AUMs) may not improve conditions on the primary use areas since livestock would continue to concentrate around water sources and other preferred areas. Reduction of numbers would, of course, shrink the size of these areas. There are certain range sites that will have a very slow response to grazing management. Examples of these include clay pans, dense clay and saline uplands. Finally, in many of these areas the land pattern is such that BLM's influence on management is minimal.

98.

Refer to Response #168.

99.

This is correct. The legend has been corrected in the final RMP/EIS.

100.

Yes. The coal which has high to moderate development potential lies between the outcrop and high to moderate potential line on Figure 3.5.

101.

Perhaps it would have been more specific to have said Red Lodge area rather than field. This has been changed in the final RMP/EIS.

102.

This is correct. The heading has been changed in the final RMP/EIS.

103.

The McCleary and Mammoth-Rehder Coal Beds both lie within the Bull Mountain Coal Field.

The Divide (Blue Flame Coal) Mine lies in the SW $\frac{1}{4}$, Sec. 24, T. 6 N., R. 26 E., and the PM Coal Mine lies in SW $\frac{1}{4}$, Sec. 13., T. 6 N., R. 26 E. (Both mines are in the Mammoth-Rehder Coal Bed, Bull Mountain Field.)

The Consolidation Coal Company test pit was opened near the outcrop of the Mammoth-Rehder Bed in SE¼, Sec. 3, T. 7 N., R. 26 E.

104.

This is correct. Both areas have Class II air quality designations. This has been corrected in the final RMP/EIS.

105.

Refer to Wildlife Assumptions, Chapter 4, and Methodology for Controlled Burns, Appendices section, in the final RMP/EIS.

106.

Refer to Response #185.

107.

The Billings Resource Area considers the protection, and enhancement of riparian and woody floodplain vegetative types a priority in all management actions and decisions. Our objective is to stabilize these vegetative communities in at least good ecological condition which will reduce streambank erosion and limit upland runoff sedimentation into active waters.

The BLM concurs that monitoring of water chemistry and sediment yield levels is essential in order to evaluate the effectiveness of this effort. We currently have water quality monitoring stations located in perennial waters which originate on or pass through large blocks of public land and tribute to major water systems. Sediment yield levels and water chemistry data are collected at regular intervals at each station.

108.

Mitigating measures will be developed through analysis of the proposed mine plan submitted by the coal lessee. The RMP is not a document designed to lease and mine coal.

109.

Burning techniques will vary depending on topography, fuels and burning objectives. Burning projects will be identified in AMPs and will, to the extent possible, be identified to meet multiple use objectives. A detailed burn plan which includes burning techniques required to meet these objectives will then be developed. The burn plan will normally include the following: (1) Resource objectives that apply, (2) burn objectives, (3) fireline required, (4) weather and fuel moisture parameters, (5) time of the year or growth stage, (6) firing method and pattern, (7) equipment and personnel needs, (8) cooperator contributions, (9) per acre costs, (10) rehabilitation (if any) and (11) post burn monitoring.

The AMP will spell out the pre and post burn grazing management. Normally, deferment will be needed prior to burning to provide enough fine fuels to carry the fire. Deferment will also be needed following the fire to allow for reestablishment of desirable perennial species. As you suggested, reseeding may be needed on some areas. Our observations of burned sagebrush areas in

the resource area show excellent response by perennial grasses and forbs without reseeding. It may be desirable, however, to seed native species on some depleted areas within burns and compare results to unseeded adjacent areas to determine the need for reseeding.

110.

Refer to Response #91.

111.

The Billings Resource Area currently has established 176 permanent transects to monitor trend in vegetative condition. The method used is a Daubenmire canopy coverage 300 foot, 30 plot transect. This transect can be duplicated and is normally read whenever the cycle is such that the particular pasture is being rested.

Additional monitoring techniques include records of actual livestock use, climatic conditions and utilization measurements. Actual use and utilization are very important components in evaluating the objectives of the allotment. When estimating utilization, the allotment is first stratified as to degree of use, then measurements are taken within these stratifications using the Lommason-Jensen height/weight relationship method.

The "I" category allotments will receive the majority of attention to ensure the objectives as set forth to resolve the conflicts are being met. The "M" and "C" allotments in most cases will only be monitored at an intensity to detect problems or conflicts that may arise.

112.

On July 7, 1983, the Montana State Director issued Instruction Memorandum No. MT-83-291, which states that "until a policy and procedures are developed, any exchange proposals or sales are to be avoided in areas where "sodbusting" or the possibility thereof is a controversial issue."

113.

Without more specific information, it is difficult to determine which aspects of the high level management alternative is preferred. It should be noted, however, that the preferred level of management was selected on the basis of preserving the natural setting of the wild horse range. Many of the proposals made in the high level management alternative would detract from this setting and would also not be in keeping with preservation of wilderness characteristics.

114.

Refer to Response #10.

The limitations in both soil capabilities and low annual precipitation make interseeding and vegetative manipulations unfeasible in the horse range.

115.

Refer to Responses #4 and #344.

116.

Mineral reports were prepared for the review of the three Classification and Multiple Use Act (C&MU) segregations. These reports concluded that, within the PMWHR, there is low development potential for all locatable minerals, other than bentonite. Bentonite has moderate development potential in the Wyoming portion of the horse range. However, there are adequate supplies of bentonite to supply current demand for many years to come outside the wild horse range. The PMWHR is included in the listing of sensitive areas from the standpoint of oil and gas leasing in the final RMP/EIS (see Areas "Sensitive to Oil and Gas Leasing" Overlay in Map Pocket).

117.

This section has been rewritten. (Refer to Responsibilities Common to All Land Use Plan Alternatives [Fire], Chapter 1, FEIS.)

118.

Oil and gas exploration obviously will result in some impact to the resources described. Standard stipulations will provide adequate protection in most cases. Where it is shown that standard stipulations would not be sufficient, that area would be considered "sensitive", and special stipulations for resource protection would be developed and applied prior to issuance of an application for a permit to drill. The words "in most cases" on page 7 of the draft have been eliminated from the final RMP/EIS.

119.

Refer to Response #15.

120.

Refer to Issues Considered in Land Use Plan Alternatives, Chapter 1, FEIS. As stated above in Response #112, BLM will not accommodate "sodbusting" practices.

121.

The parcel of land in question technically lies within the boundary of the PMWHR. However, the Secretarial Order designating the PMWHR states the following:

"... the boundaries thereof shall conform to natural barriers and feasible fencing routes within the area designated in this order."

Since the parcel lies outside of the boundary fence, wild horses or their management were not affected. Following issuance of patent, the PMWHR designation will be removed from this parcel.

122.

The BLM is not considering coal leasing in the Bull Mountains at this time. The purpose of the coal analysis in the RMP is to determine what areas of coal would be acceptable for further consideration. Should a demand for leasing be identified in the activity planning which follows the completion of the RMP/EIS, a complete analysis would be conducted as required by 43 CFR 3420.3.

A new appendix item depicting the results of the application of the unsuitability criteria has been prepared (see Appendices section, final RMP/EIS).

123.

Refer to Responses #160 and #168.

124.

Refer to Response #169.

125.

Appendix 4.1, page A-60, part 4(B) in the draft RMP/EIS included an explanation that BLM will evaluate each newly constructed reservoir for potential installation of waterfowl nesting islands. In addition, BLM has identified in the proposed action section of the final RMP/EIS, 50 additional waterfowl nesting islands to be constructed in existing reservoirs.

The BLM's proposed action also identifies seven reservoir fencing projects for the benefit of waterfowl and other upland nesting bird production purposes. We concur with the research findings of the MDFWP as it relates to nesting cover for waterfowl. The objective of these projects is to provide protection for as much upland cover as is feasible. When planning the project, providing for the use of the water source by livestock must also be taken into consideration. Occasionally, this places some restrictions on the project as it relates to design and size. However, BLM's objective is to enclose, wherever feasible, 50 acre tracts around water sources. A change has been made in the final RMP/EIS to reflect this acreage change. This does not necessarily provide an optimum situation for wildlife, but BLM feels it does provide needed protection for nesting waterfowl and upland birds under a multiple use management concept.

The BLM also has a policy of coordinating the design and location of these projects with MDFWP biologists.

126.

The BLM concurs that the acreage affected by limiting ORV use to existing designated roads would be somewhat less than the 57,900 acres we have identified in the DEIS.

The BLM anticipates some incidental disturbance to occur along existing or designated roads due to vehicle travel and human intrusion on foot into the area. The BLM also recognizes that total enforcement of a closure is impossible and some travel off the designated roads will continue to occur.

However, for purposes of analysis, BLM could not establish an accurate method to estimate the actual distance from an established road that would be significantly disturbed by vehicle travel. Therefore, the acreages of affected habitat were estimated from actual existing road corridors.

The real issue we are trying to mitigate in this instance is not the travel which is occurring along the existing designated roads. It is the indiscriminate, cross-country travel which is occurring that tramples and destroys upland brush and grass. This is the type of use we are trying to reduce through the limited ORV designations.

Reducing the cross-country disturbance of upland vegetative types will benefit upland game bird habitat by giving some protection to their crucial nesting and wintering areas, as well as reducing the level of human induced harassment which is now occurring.

127.

Refer to Response #160.

128.

Refer to Response #164.

129.

BLM did not mean to imply in our discussion of impacts that the proposal was to destroy 18% of the antelope winter range or 25% of the sage grouse dancing grounds through sagebrush burning. The discussion was intended to identify and quantify the absolute maximum adverse impacts to the various wildlife resources if no consideration was given to protecting crucial wildlife habitats. Very generic impact discussions were used because we have not yet completed our onsite analysis of the allotments we feel might have the potential for some beneficial burns.

Please refer to Wildlife Assumptions, Chapter 4, and Methodology for Controlled Burns, Appendices section of the FEIS, which identifies the assumptions used, and provides an explanation of the procedure and criteria which will be followed to delineate and conduct a burn.

130.

Refer to Response #129.

131.

Refer to Wildlife Assumptions, Chapter 4, and Methodology for Controlled Burns, Appendices section of the final RMP/EIS.

132.

A wilderness management plan for the Pryor Mountain area will not be prepared until Congress designates the area as components of the NWPS. The BLM is also concerned that needed flexibility be retained to ensure that wild horse and wilderness management philosophies are in concert and actually do complement one another. Future management plans will be developed with these objectives in mind.

Please refer to the Proposed Action for Wild Horse Interpretation (Chapter 2) of the final RMP/EIS for a discussion on recreation/tourism activities as they relate to wild horse interpretation.

133.

The final Billings RMP analyzes 13 major issues that were developed from responses obtained from public mailings and meetings. Corridor planning was found not to be a major issue of concern within the Billings Resource Area. A combined state and Federal effort, however, is presently studying possible corridors in Montana. The final RMP identifies Exclusion and Avoidance Areas in order to protect areas with special resource values (see page 3, paragraph 6-9 of the draft RMP).

134.

The recreation management program, as briefly described on page 5 of the draft RMP/EIS, is a very low level program in the Billings Resource Area. A large portion of the public lands in the resource area consists of isolated scattered tracts (see Map 1—Map Pocket), surrounded by privately-owned lands and do not have legal access. As such, except where local or national issues exist such as wilderness, ORV use, land acquisition, or public access, very little use information or site-specific data exists. Alternative methods of resolving the major issues were developed to the extent possible and subjected to impact analysis. The problem with non-issue elements in the recreation program is that there is really very little opportunity to enhance recreation where land pattern and non-Federal ownership are controlling factors. The BLM did not attempt to develop and analyze expansion of a program that does not appear to be a major issue in the area.

135.

The groundwater studies were not complete; only preliminary indications were available. This preliminary information was incorporated into the RMP.

There are very few sources of non-point pollution originating on public lands. The "208 program" is an ongoing study. The available data were examined, but they had little affect on the alternatives.

136.

The visual resource management program consists of subjecting site-specific proposals such as pipelines, fences, roads, etc., to a screening or clearance process to avoid adverse visual impacts during environmental assessment of a proposed action. There are no real alternative possibilities on a plan-wide basis in establishing alternative visual resource classes. For further description of this program, refer to Appendix 4.6, Methodology Used to Determine Impacts to Visual Resources in the DEIS.

137.

Data concerning visitor use days, projected future demand and economic impacts of tourism and recreation is either very spotty or nonexistent for most of the public lands in the resource area. This is dictated in part by the scattered land pattern within the resource area. It was felt that as there were no issues relating to the overall recreation program, that meaningful use of what data is available would not be possible.

138.

Management decisions are based upon assessing the environmental impacts of a specific alternative using the inventory and resource data available to support that assessment. Decisions are made on the basis of the best information available at the time. When funds become available, new inventories are completed and existing data is updated. The addition of data to inventory files is an ongoing continual process and is a key segment of the resource area's monitoring program.

Important data gaps have been identified in the final RMP/EIS. See the Appendices section of the FEIS and the Proposed Action for Land Tenure Adjustment in Chapter 2 for a discussion of the EA/LR needed for land tenure adjustment.

139.

Refer to Response #220.

140.

The BLM considered several areas or sites within the resource area that had potential as Areas of Critical Environmental Concern (ACEC) as part of the RMP formulations. In some cases, especially where cultural sites were concerned, identification as an ACEC could result in potential resource degradation if the site was given this designation and revealed to the general public. A number of such sensitive areas are included within the wilderness proposals for the Pryor Mountains. Wilderness designation could provide much more stringent resource protection than does ACEC designation.

In addition, the BLM has mapped and provided a list of "sensitive areas" where protective lease stipulations may be needed to ensure protection of certain resource values. See the Appendices section and the sensitive areas overlay in the Map Pocket of the final RMP/EIS.

As with most BLM programs, ACEC considerations are part of ongoing programs and will be proposed for designation where existing management will not provide adequate protection.

141.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

142.

As stated, disposal of any public land parcels cannot be made until a site-specific evaluation has been completed which shows a definite public benefit arising from such disposal. This evaluation will be made as interest is expressed in individual tracts for sale or exchange. The predominant method of disposal will be through exchange as stated in the Proposed Action for Land Tenure Adjustment, Chapter 2, FEIS.

143.

Refer to Response #15.

144.

As directed in the President's Council on Environmental Quality (CEQ) regulations, Section 1502.15, Affected Environment, it is the existing situation that is to be used as the basis for comparison for measuring the effects of the alternatives. For all issues identified in the RMP, the No Action Alternative—the Bureau's management program at the time the proposed action is being written—is, for the purposes of maintaining consistency in documentation and to demonstrate cause and effect, the existing management situation that is used as the point of departure for describing the individual actions of the various alternatives, including the No Grazing Alternative.

As discussed in the Introduction section of the Alternatives Chapter of the draft RMP/EIS, the No Grazing Alternative was considered and analyzed during the scoping phase of developing this resource management plan. Based on this analysis and the rationale discussed in the draft RMP (page 11), the No Grazing Alternative was dropped from further discussion in the draft document as provided in Section 1502.14(a) of the regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA), as promulgated by the CEQ.

The detailed analysis of the No Grazing Alternative, in compliance with Section 1502.21 of the regulations cited, is available at the Billings Resource Area Office, 810 East Main, Billings, Montana, for inspection by interested persons. In response to the National Resource Defense Council (NRDC) comment, however, the following impact analysis summary and conclusions for the No Grazing Alternative are incorporated herein.

1. Range Improvements

In order to exclude livestock from public lands in the Billings Resource Area, it would be necessary to construct approximately 2,456 additional miles of fence at a total cost of \$4,912,000. The fragmented land pattern of the public lands in this area makes the cost of this "alternative" very prohibitive. Maintenance costs would assumably be borne by the BLM at an annual cost of \$340,000. This cost is based on a \$100 per mile normal maintenance. This cost would undoubtedly be inflated due to vandalism. Additionally, supervision by BLM personnel would prove to be extremely costly.

2. Wildlife

Previous analysis has shown that exclusion of livestock is not a cure-all. In the *Prairie Potholes EIS*, for example, it was found that "The lack of livestock grazing would not necessarily improve the quantity of all wildlife forage and cover. Additional forage and cover would more than satisfy the needs of increased populations of upland game birds, waterfowl, nongame wildlife and fisheries. Big game forage, however, could be reduced as plant communities changed from shrubs to grass." The long-term result is uncertain as the area has always been grazed by large ungulates (buffalo before livestock)

and the response of wildlife species in the absence of large ungulates has not been observed over such a large area.

3. Vegetation and Range Condition

Exclusion of livestock grazing would improve range condition rapidly on clayey and sandy range sites which are not dominated by dense sagebrush or blue grama. A slow response would occur on the sagebrush dominated sites, blue grama areas and on soils with limiting factors such as high lime content, low permeability, stoniness and salinity. The change in ecological condition is expected to be similar to the high level alternative. Without the stimulation of grazing, plant vigor and production would level off and stagnate on most soils in the long term (Tuellar and Tower, 1979; Houston and Woodward, 1966). Observations of exclosures throughout this part of Montana indicate that litter build-up greatly reduces desirable plant vigor within 10 years and often allows weeds to invade the exclosure. At the end of 25 years, range condition would be declining on many of the better sites and stagnating elsewhere.

4. Recreation

Recreation access would be severely impacted by the 2,456 miles of fence in addition to the predictable closure of private lands by ranchers in reaction to the exclusion of livestock from public lands.

5. Livestock Production

The loss of grazing would reduce animal productivity on private and state lands, too, as livestock would have to trail to make use of the scattered private and state holdings. This would cause livestock stress and reduce calf weaning weights and other productivity factors. Stress would also be increased because of fences enclosing public lands. Livestock would be excluded from water, forage and shade areas on public lands and would trail along fence lines.

The elimination of livestock on all public lands in the RMP area would cause a loss in livestock production of 4,097,428 pounds of beef.

Calculations were based on pounds of live weight produced by yearlings grazing for six months. Estimated average daily gain of yearlings grazing spring-fall is 1.75 pounds. The daily gain may be much higher (2-3 pounds/day) in the spring. A yearling factor of .75 was used to adjust AUMs.

Calculations are as follows:

$$\begin{aligned} 62,437 \text{ AUMs} \times 1.25 &= 78,046 \text{ yearling AUMs} \\ 78,046 \times 52.5 \text{ (monthly gain } 30 \times 1.75) &= \\ 4,097,428 \text{ pounds} \end{aligned}$$

6. Economics

In this alternative all grazing on public lands would be eliminated in the short and long term. The number of ranch operations affected by this action would be 333. Table 1 shows the impacts to operators by representative size categories. Without Federal grazing, each of the representative livestock categories would have a decrease in ranch income ranging from \$2,035 for small operations (71% decrease) to \$12,939 for very large operations (20% decrease). The total decrease in net annual income to all affected ranch operations would be \$2,304,027, a decrease of 28%.

Elimination of Federal grazing would reduce permit values for the 333 different affected ranches by the full amount of their current value of \$6,243,700. These decreases in permit value would have a detrimental effect on ranchers' borrowing capacity and the sale value of affected ranches. For ranches that are heavily dependent on BLM AUMs, the overall reduction in ranch value could be considerably more than the \$100 per AUM because elimination of Federal grazing may virtually destroy the ranch as an economic unit.

Since a major source of income for most of the operators is ranching, any reduction in ranch income would cause an equivalent reduction in their personal income. Even with substantial reductions in income, most small commercial operators would probably continue ranching, at least in the short term. There are various actions that small operators might take to enable them to continue operating. These actions include not allowing for depreciation, deferring maintenance or using equity capital to meet short-term operating and family living expenses. Those individuals not now employed off the ranch might seek outside part-time or full-time employment.

7. Social

The social well-being of the families dependent on the 333 ranches in the study area would decrease in the short and long terms under this alternative. The magnitude of the impacts would vary based on the operator dependency on BLM grazing and the ability of the operation to adapt to the forage loss. It is expected that some operations would be severely impacted while others would feel little effect.

Impacts from loss of access to public grazing lands would be most adverse to small operators and to people just starting out in the ranching business, as many of them are barely managing to keep pace with inflation and rising interest costs as it is. For many of them, reduction in personal income and an accompanying drop in their overall sense of security could be expected to result. With 1 or 2 years of bad weather, negative impacts from loss of public forage would, of course, be magnified.

Although BLM regulations do not recognize the right to treat grazing permits as real property,

TABLE 1
Estimated short and long term impacts of the No Grazing Alternative on Net Annual Ranch Income on Affected Ranches

Ranch Size Category	Size by # of Brood Cows	Number of Ranches*	Average Dec. BLM AUMs/Ranch	Average Annual Net Income per Ranch	Change in Income	
					\$	%
Small	1-100	86	62	\$2,846	-2,035	-71
Medium	101-250	109	160	10,662	-6,235	-58
Large	251-499	52	227	24,501	-7,963	-33
Very Large	500 and up	86	323	65,341	-12,939	-20

*These figures are extrapolations from the 43 "I" and "M" category ranches to the 333 ranches with BLM grazing permits in the entire study area.

Source: BLM, 1983

bankers and realtors consider the permits to have value. One impact to ranchers, therefore, from loss of public AUMs would be the devaluation of the ranch property. That loss could result in added frustration for area operators in obtaining loans in the future. Consequently, opportunities for economic gain and thus opportunities for enhancement of social well-being would be foregone.

Income reduction could also force operators and their families to seek off-ranch employment. For those ranchers who are advancing in age or who live 20-30 miles from the nearest town, however, the prospects of competing in a larger job market would be dim.

If a rancher could not afford to purchase hay or to reduce herd sizes and still maintain a viable operation, he might eventually have to quit the livestock business. Besides losing the business, he and his family would also suffer many intangible losses, such as loss of the opportunity to live a preferred lifestyle, loss of ancestral ties to the lands and possibly the breakup of extended families and close circles of friends.

For those ranchers with very limited dependence on Federal lands, the loss of access to public land would likely create more of an inconvenience than it would a financial hardship. However, because of the dispersed pattern in which parcels of public land occur throughout their private holdings, these ranchers may have to deal with the frustration of seeing their own holdings cut in half or broken up by fences, meaning some alteration of traditional management patterns would have to be made.

8. Regional Economics

Table 2 shows the impact on the resource area's output, earnings and employment with a reduction in livestock sales associated with the No Grazing Alternative. In the short and long term there would be an annual reduction in the value of livestock sales

of about \$2,728,000. The decrease in total annual gross business volume would be approximately \$9,405,000. Total employment in the resource area would decrease by approximately 266 people and total earnings would decrease by \$2,853,000 annually (less than 1% of the resource area total in 1979). This would be insignificant to the total economy of the resource area.

TABLE 2
Estimated Impact of the No Grazing Alternative on Output, Employment and Earnings

Short and Long Term Changes	Decrease
Livestock Sales (\$1,000) ¹	\$2,728
Gross Business Volume (\$1,000) ²	9,045
Earnings (\$1,000) ²	2,853
Employment ²	266

¹Based on an annual beef production of 4,097,428 lbs. and a price of \$66.59/cut (1979 dollars).

²BLM, Montana Economic and Demographic Model.

9. Social Attitudes

No specific information on attitudes toward this alternative has been collected. However, reactions of ranchers and those who identify with them would be expected to be extremely negative. Even though some ranches would experience little or no impact personally, they would likely sympathize with ranchers who they suspected would suffer more adverse impacts. It could be expected that wholesale resentment toward BLM policies would grow and likely persist into the foreseeable future. This alternative would strengthen resolve that planning for public lands should be done at the local level.

Although vegetation for wildlife and watershed would increase, recreationists and environmentalists might not support the 2,456 miles of fence that would have to be constructed to exclude livestock. In addition, this alternative might lead to increased conflicts between hunters and ranchers as ranchers might react by closing their private land to hunting.

145.

Current policy directs the BLM to identify those areas where there are resource problems or conflicts and concentrate the available money and manpower to resolve those situations. The 1981 inventory evaluated all the major blocks of public land as well as those more isolated areas that had known problems. Due to limited funding for inventories and the scattered and isolated nature of much of the public land in the Billings Resource Area, our efforts were limited to those areas where our actions would be feasible and cost effective. Through the categorization process, areas with substantial problems or conflicts were placed in the "I" or improve category.

Our inventory was geared to evaluating the basic soil and vegetative resources to a level that would allow us to assess current conditions as well as make meaningful projections in respect to response time resulting from various actions.

The BLM did consider a substantial (20%) reduction in the low level alternative for analysis purposes. This was only applied to the "I" category allotments since this was where the problems were identified. Therefore, the proposed allocation of total AUMs does not vary greatly between alternatives, but does analyze significantly different levels of use for the areas.

The long-term spread was from 62,437 to 73,148 AUMs, which is an 18% difference. Also, the Billings Resource Area is carrying 7,785 AUMs in suspended nonuse. In other words, at the time of adjudication, the Bureau imposed a reduction of 7,785 AUMs from the actual livestock use at that time.

146.

Soil and vegetation inventories were conducted as explained in Response #145. This information is available at the Billings Resource Area Office and is mapped in detail on orthophoto quad maps as well as tabulated in various computer printouts. Space was very limited in the RMP document as compared to grazing EISs. Much of the basic data has already been collected, at least enough to determine current conditions in the areas inventoried. Also, "prospects" and "alternatives" were considered in the categorization process. Detailed, allotment-specific recommendations will be made at the activity planning stage through coordination with the operator, other state and Federal agencies, and the interdisciplinary input of the resource area staff.

Trend information has been collected on all allotments under implemented AMPs which encompass 154,639 acres (Tables 2.4 and 3.7 of the DEIS). At the time the inventory was being conducted, a trend assessment

was made at each write-up site. This assessment was based on observed erosion condition, plant vigor and reproduction, species composition, and evidence of past as well as current grazing use. The range conservationist's judgement of trend was a major factor in the allotment categorization process. For example, the State Line allotment (number 4003) is a large allotment (21,738 BLM acres) with only 52% of the range in good and excellent condition. However, it was placed in the "M" category because trend appeared upward under current management. As previously stated, the categorization process focused attention on the "I" allotments. Criteria for placing pastures in this category included the presence of a downward trend, unsatisfactory condition with a static trend, and the land pattern must be such that BLM's actions could have a significant influence on management.

Table 3.7 in Chapter 3 of the final RMP/EIS displays actual use summaries for implemented AMPs.

147.

The site-specific range improvement actions for each "I" allotment will not be decided until AMPs are developed. One component of AMP development involves an analysis of the cost efficiency of the money spent on range improvements within the allotment. This is accomplished by entering a project or projects into a computer to determine a cost-benefit ratio. The kinds and numbers of projects are dependent in part on this analysis. The process of developing an AMP involves interdisciplinary teamwork with range, wildlife and watershed specialists as well as the livestock operator. Final management proposals may be somewhat different than the estimated range improvements shown in Table 2.5 of the DEIS. However, the management direction has been set by the objectives and constraints identified in Table 2.2 of the DEIS and efforts will be focused in the "I" allotments.

The range improvement estimates were made by calculating an appropriate pasture division in each allotment in order to implement an improved grazing management system, normally a deferred or rest rotation system. In some allotments there were already adequate fences, so additional fences were not proposed. Water developments and land treatments were also general estimates. These allotment-specific estimates are available at the Resource Area Office. They were not included in the RMP/EIS because they are preliminary estimates and do not represent a commitment to a rancher or other interest to invest a specific amount and kind of range improvements in the allotment. The response to grazing management was estimated through the knowledge of soil capabilities (Tables 4.1 and 4.2 of the DEIS) as observed on these soils in rest rotation and deferred rotation systems.

148.

The commentor is confusing surface owner consultation with surface owner consent. Consultation is part of the planning process whereby BLM sought the opinions of surface owners as it pertains to surface coal leasing, not their consent to have the underlying coal leased.

The term "significant number" may vary from field to field. The high/moderate, surface owner consultation, and unsuitability criteria and multiple use screens were applied before development of alternatives, since Federal coal regulations require that these screens be applied. If additional multiple use concerns are identified, additional acreage may be deleted.

Criteria #1-6, #8, and #16-20 were applied. Only criterion #7 and #9-15 were not fully applied. Only criteria #2, #3, #16 and #19 resulted in definite unsuitable areas. The results are shown on Figure 2.8 of the DEIS. The remaining criteria were applied, but do not affect the availability of coal.

Criterion #19 was applied only preliminarily. Possible alluvial valley floors (AVF) were identified. The Office of Surface Mining (OSM) and Montana Department of State Lands must make the final determination on the location and extent of AVFs prior to mine plan approval.

149.

Specific, quantitative impacts were not presented in the DEIS because site-specific wildlife data has not yet been collected. Please refer to the Appendices section (application of coal unsuitability criteria) for a summary of data which is available, and that which will be collected in order to fully apply unsuitability criteria #9-15. These inventories are scheduled to begin in FY-84.

Criterion #15 specifically identifies critical deer and elk winter ranges as areas to be recommended as unsuitable for mining. Proper application of this criterion should insure a balance is maintained between winter and spring/summer big game ranges.

(Also refer to Response #247.)

150.

The RMP is not a decision making document in regard to coal leasing. It provides a screening process for coal to define areas that are suitable and not suitable for further consideration for leasing. For the areas that pass through the screens, activity planning (site-specific analysis and a regional EIS) must be completed before leasing can occur. Because no specific proposals are being evaluated here, detailed analysis of individual ranch related economic impacts are not provided. Agricultural economic impacts will be assessed at the activity planning stage. Additional general coal related agriculture impacts have been added to Chapter 4 of the final RMP/EIS.

For a more specific discussion of the coal process, refer to Issues Analyzed in Land Use Plan Alternatives (Coal), Chapter 1, FEIS.

151.

In either an exchange or sale proposal, the public interest is determined by evaluations in conjunction with the EA/LR. The one criterion that justifies a land exchange is that the values received are greater than that given up. The values could be any one or a number of things including improved access, more efficient management, wildlife habitat, increased recreational opportunities,

etc. Blocking up Federal land by exchange is warranted where the public accrues some benefit from that exchange. Blocking up just for the sake of blocking up is not warranted.

152.

Site-specific in-depth analysis of environmental impacts to all resources cannot be included in this document due to unavailable site-specific land use proposals. Programs such as oil and gas development are ongoing and evaluated on a case-by-case basis as specific drill plans are proposed and submitted to BLM for approval. This includes an in-depth multidisciplinary environmental assessment of anticipated impacts associated with the drilling activity itself as well as any other development work needed such as access roads, etc. Stipulations are then developed and attached to the permit for mitigation, to the extent possible, of any adverse impacts. This same process is utilized by BLM for all proposed actions which involve potential land disturbing activities.

It is BLM's intent to map available site-specific proposals carried forward in the proposed action when the Record of Decision is published.

The BLM's role in wildlife management is that of habitat protection or enhancement. Therefore, impacts are quantified utilizing acreage figures.

The MDFWP has the responsibility of wildlife species population control and assessment. The MDFWP is consulted and requested to offer an opinion on any proposed action in which BLM determines through the environmental assessment process that a significant impact, either favorable or adverse, could result to a specific population of animals. This consultation and evaluation of affect to population numbers is carried out on a case-by-case basis as specific land use proposals are made.

The effects of erosion and sediment yields vary greatly among the various soil structures. These impacts must also be specifically identified and quantified on a case-by-case basis in the environmental assessment process as site-specific proposals are made. Acre feet of runoff was presented utilizing currently available average precipitation levels.

153.

With the scattered nature of Federal lands in the resource area, most access road development would be occurring upon private lands. Furthermore, access roads for exploratory wells are narrow, with minimum necessary construction. Less than 1 acre per mile of access is generally affected.

The list of available stipulations may be found in Appendix 1.5 of the DEIS. The Lewistown District Programmatic EA offers a much more complete analysis of oil and gas exploration and development activities and mitigating measures.

154.

Refer to Response #15.

155.

Section 203(a)(1) of FLPMA specifically allows for disposal of public land if "such tract because of its location or other characteristics is difficult and uneconomic to manage. . . ." However, prior to disposal, a site-specific EA/LR would evaluate all applicable values, of which difficulty of management is only one.

156.

The BLM does not have a policy of encouraging subdivision of agricultural lands. If subdivision of agricultural land was a possibility in a proposed land sale or exchange, the possible effects would be fully analyzed prior to any recommendation.

157.

Also, in a July 7, 1983 letter to Secretary of the Interior, James Watt, Edwin Harper, Chairman of the Federal Property Review Board, affirmed the Department of Interior's traditional independence in carrying out a land disposal and adjustment program. In essence, this letter exempts BLM from the Asset Management Program. However, BLM will continue a lands adjustment program on an opportunity basis in keeping with a common sense management approach within the existing management alternative.

For a narrative of the process involved in land adjustment, see the Proposed Action for Land Tenure Adjustment, Chapter 2, FEIS. This process adequately provides for public input on any and all aspects of proposed land actions.

158.

See the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

159.

The RMP process is directed towards identifying and analyzing issue-driven land uses which are authorized on the public lands. The major issues carried forward to be analyzed in the DEIS were determined through public responses during the scoping process and by BLM specialists.

In-depth analysis of the production and extraction of saleable commodities was included in the DEIS due to the potential significant impacts these activities could have socially, economically and to other resource values.

In regard to the analysis presented for other resource values and amenities such as fish and wildlife habitats, our intent was to present the habitat requirements of the major species of interest, and quantify the crucial or key habitats which could potentially be affected should a proposed development occur. This information can be found on pages 75 through 78 in the DEIS and is also available in greater detail on map overlays available in the Billings Resource Area Office. Detailed site-specific analysis of impacts could not be addressed under each proposal and alternative level since definite boundaries or locations of many of the proposed actions were not available.

A complete assessment of anticipated impacts to all resource values will be completed as site-specific proposals are made, prior to any development work. If important wildlife values are in conflict with other program proposals, trade-offs will usually be made to the benefit of wildlife.

BLM monitors actual public use at a few selected sites such as the Pryor Mountain Wild Horse Range, Asparagus Point and the environmental education sites near Billings. Our only other indicators of public use are personal observation and hunter use statistics provided by MDFWP. These statistics are on file at the Billings Resource Area Office and available for public inspection.

Recreational access needs as identified through the scoping process and through meetings with user groups and the Montana Department of Fish, Wildlife and Parks as the RMP was being developed are identified on page 37 of the DEIS. Additional sites will be considered for access as the interest or need arises.

160.

BLM does not intend to imply that "good" grazing management automatically leads to good wildlife habitat management and production. We believe that management practices can be beneficial to livestock and certain wildlife species if the objectives of both programs are fully coordinated. Our interpretation and objective in good grazing management is the establishment of grazing systems and assignment of livestock numbers which are compatible with the forage available, and which does not maximize its utilization at the expense of other resources such as wildlife habitat. Our wildlife objectives, in turn, are to maintain and enhance good habitat conditions for key species of wildlife. In order to merge these objectives, which are not synonymous and which will sometimes conflict, we have initiated a coordinated management plan approach to the development of allotment management plans. This approach requires that specific objectives for both grazing management and wildlife are developed on an individual allotment basis, and trade-offs analyzed and agreed to prior to allotment management plan implementation.

The primary goal of grazing management is to strive for and maintain ecological range condition in at least good condition through the use of grazing systems and such improvements as fencing, addition of water sources and vegetative manipulations.

Wildlife management objectives are much more diversified and complex. An assessment of the habitats which are present, including wetland, riparian and woody floodplain types, must be made, and an evaluation as to their condition completed. Crucial habitats such as wintering areas, upland bird mating and nesting sites, elk calving areas, migration routes, threatened and endangered (T&E) species habitat and special habitat features such as cliffs and dead snags must be delineated. Potential project developments must be identified which take into consideration the needs of both game and nongame species. Site-specific objectives to maintain or enhance the habitat for the key species within the area are then developed. This process is completed in consultation with MDFWP.

The wildlife objectives and proposed developments are then compared to the proposed objectives and developments of the grazing management program. In cases where significant conflicts appear, alternatives are developed to minimize the problems. It then becomes a management decision as to which alternative is selected and what trade-offs, if any, can and will occur. Appendix 4.1, page A-60 of the draft RMP/EIS lists some standard stipulations and criteria to protect or enhance wildlife habitats which must be applied.

In addition to the coordinated approach to new grazing management plans, the Billings Resource Area is currently working on a complete analysis of existing allotment management plans, utilizing the same approach. For those plans already having wildlife objectives incorporated, we are verifying their adequacy and/or success. For those allotments not having specific objectives, this office is developing objectives, utilizing the criteria and processes initiated for new grazing management plans.

As a follow-up measure, on both the existing and new grazing management plans, a joint range/wildlife monitoring plan is being developed and initiated on each allotment which will closely follow all planned objectives and document the progress, both favorable and unfavorable.

In addition to the wildlife management input into AMPs, as part of the preferred alternative, this office will also develop a habitat management plan (HMP) for chukar partridge. Habitat management plans are developed in order to provide specific management direction over large expanses of public land to achieve long-term habitat management objectives for an individual or related group of wildlife species.

We are also considering development of HMPs for such species as mule deer, antelope, bighorn sheep, sage grouse, sharptail grouse, waterfowl, fisheries and prairie dogs. Completion of these plans will be dependent upon available funding and manpower capability.

161.

Due to the very scattered nature of the public land pattern found within the Billings Resource Area and given the limited BLM budget and manpower capability for wildlife, a site-specific wildlife improvement plan for each tract of public land simply is not feasible.

Please refer to Response #160 and Objectives Section in Chapter 2 of the FEIS, for a discussion of wildlife objectives and goals and on explanation of ongoing efforts to fully integrate these objectives and goals into existing and proposed allotment management plans. In the long term, this will place approximately 195,822 acres or 46% of the surface acreage administered by BLM within the resource area under a management plan which recognizes wildlife needs and provides for monitoring of habitat conditions.

In addition to this effort, similar wildlife objectives and goals will be incorporated into the management plan for the PMWHR which encompasses 44,296 acres or an additional 10% of the resource area. This plan will be developed in FY 1984.

We recognize these plans will not cover every tract of land. However, before any land disturbing activity resulting from commodity production or extraction can occur, a site-specific environmental assessment must be completed. This requires input from all disciplines, including a wildlife biologist.

162.

The Billings Resource Area Office inventoried 36,795 acres of public land within the Land Tenure Adjustment Area and made preliminary recommendations for retention, disposal and further study category tracts. (Page 33, paragraphs 3-13 of the draft RMP/EIS, and Appendix 1.6, pages A-10—A-16.) These were preliminary identifications based upon the criteria listed in Appendix 1.3, page A-4 of the DEIS. It was the intent of this office to receive public comment on the draft criteria and the lands tentatively classified in the three categories.

The current constraints on the length of planning documents renders it impossible to include a tract by tract analysis within the document itself. Therefore, the RMP is meant to provide general guidance to specific programs. Site-specific activity planning addressing proposed land sales or exchanges is handled within the EA/LR. In other words, a multidisciplinary review, including intensive wildlife and cultural resource inventories will be conducted prior to any public lands being formally offered for sale or exchange. This step was not properly explained in the draft RMP/EIS. See the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

Specialists representing all resource interests discussed in this planning document were assigned to the interdisciplinary team. These individuals were well qualified to address the issue areas and assess the environmental consequences of the four alternative levels. Reviews of the draft materials were also conducted by competent specialists representing all resource interests at the BLM District and State Office levels.

163.

Refer to Response #160.

164.

We have identified some allotments in the southern portion of the resource area for consideration and evaluation as potential sites for sagebrush manipulation by burning. Please refer to Table 2.2, pages 12 and 13 of the DEIS for a listing of the allotments under consideration. However, no lands have been identified for possible controlled burns which lie within the State of Wyoming. BLM did not intend to imply that these burns, if conducted, would be of benefit to sharp-tailed grouse. The key species are chukar partridge, sage grouse and antelope.

The potential increases in sharp-tailed grouse habitat mentioned in Chapter 2, Summary of Environmental Consequences by Alternative, refers to burning which is being considered on allotments north of the Yellowstone River. Several of these allotments currently support active populations of sharp-tailed grouse. These allotments are again identified on pages 12 and 13 of the DEIS. Specific geographic locations can be made from

the allotment map overlay provided in the back map pocket in the DEIS. Burns will not be conducted on any portions of these allotments which would adversely affect sharp-tailed grouse.

165.

We concur that much of the public land within the resource area supports excellent wildlife populations and habitat. In fact, much of the area contains tracts which provide either all or a portion of crucial habitats for many species.

Excellent wildlife habitat and species population concentration areas did not surface as an issue in the scoping or public response phases of the RMP process, and therefore were treated in a generic manner in the document. This is not to say these concerns do not receive special management emphasis. In fact, these areas receive the highest priority for consideration in the land use planning process, and in the evaluation and mitigation of any proposed development activities.

The areas we refer to as crucial habitat or habitats requiring special management attention are mapped and available for public review in the resource area headquarters. All mapping is updated regularly utilizing data collected by BLM and MDFWP.

166.

Our records and inventory data verify that the SE¼ of T. 9 S., R. 24 E. is high value sage grouse habitat. The BLM is not proposing that any of this quarter section be considered for sagebrush burning.

We also recognize that areas of the public lands within T. 9 S., R. 21 E. contain high value habitat for sage grouse and pronghorn antelope. A portion of this township is being considered for possible sagebrush manipulation through burning. Please refer to Response #131 for a detailed explanation of the procedure that will be used to evaluate the area and the criteria which must be met before burning will occur. We feel confident, based on the criteria we have established and the level of analysis and coordination with MDFWP which will be required, that adverse impacts to wildlife and wildlife habitat will be adequately assessed and mitigated if burning is to occur. No action will be undertaken which would adversely affect the hunter use of the area.

167.

The BLM believes that a key element in the management of nongame wildlife species is to provide as diverse an array of habitat types as possible. This includes not only diversity in plant species, but also structure and ecological condition of the various communities, as well as special habitat features such as cliffs, caves and dead tree snags. Realizing we are dealing with an estimated 170+ species of birds, 95+ species of mammals, 25+ species of reptiles and 35+ species of fish, which we know occur within the Billings Resource Area, a site-specific management plan for all species clearly approaches the impossible. Additionally, it is not the intent of the resource management plan process to be that site-specific. Therefore, maintenance of these

diverse habitats has become the primary objective of our nongame program. As stated on page 78, column 1, paragraph 2 of the DEIS, we recognize certain species as requiring special management consideration due to their uniqueness or special habitat requirements. These species and their habitats are carefully evaluated in every land use environmental assessment to ensure they are not significantly impacted.

Even though this office receives very little funding for nongame habitat enhancement, we do require ramps be installed in all new stockwatering tanks, provide nesting boxes for bluebirds and wood ducks, construct raptor nesting platforms, fence small areas such as pasture corners and seeps, protect old dead snags and restrict public use of caves used as bat hibernaculums as routine nongame species habitat management practices.

The resource area office presents two to three talk/slide show programs to the public schools and service organizations annually for public education and interpretation purposes. The BLM also provides an onsite wildlife habitat interpretation and display for cub scout troops at the Ah-Nei Environmental Education Site near Shepherd. Our biologist spends one week annually with girl scout volunteers doing habitat data collection, interpretation and project maintenance, provides wildlife and habitat displays for visitors to the Billings Resource Area Office and makes available a number of preserved specimens to anyone wishing to use them for educational or display purposes. The resource area wildlife biologist is available at any time upon request to provide any of the above mentioned services.

The nongame program and public education program were not discussed in detail in the DEIS since they did not surface as issues during the scoping process and public response period.

168.

Please refer to Response #160 for a detailed explanation of the ongoing and future efforts being utilized to fully integrate wildlife objectives and goals into the grazing management program. In addition, page 40 of the DEIS contains a listing of proposed improvements aimed specifically at enhancing wildlife habitats which could not be achieved through a coordinated wildlife/grazing management plan either because they are needed outside an existing or proposed AMP or because their implementation would be solely for the benefit of the wildlife resource.

We anticipate adjustments in livestock numbers and systems will be required either temporarily or permanently in order to meet our joint long-term wildlife/grazing management objectives. The allotment categorization process was the tool we used to initially identify problem areas. An explanation of the categories and their meaning can be found on page 11 of the DEIS.

The primary criteria used to identify these problem areas were range condition, economic feasibility to resolve problems, land ownership pattern as it offsets BLM manageability and resource conflicts. Conflicts between wildlife habitat needs and grazing objectives

were carefully evaluated in the process. The BLM believes that a joint wildlife/range monitoring program will play a key role in the identification of specific problems and adjustment needs. The assignment of an allotment into one of the categories is a dynamic process which allows BLM the flexibility to change an allotment's category at anytime when an anticipated or demonstrated need is identified.

The increase in AUMs shown on page 148 of the DEIS was calculated on the premise that through the improvement in range condition resulting from management actions, increased forage would be produced. These projections were over the long term (25 years) and even then would only "potentially be available to livestock." The increased AUMs were computed using the Soil Conservation Service (SCS) technical grazing guides which specify a livestock stocking rate for each range site in each ecological condition, precipitation zone, and geographic area. These guides were developed by the SCS through input from soil scientists, range conservationists and wildlife biologists (SCS, personal communication). Wildlife did receive consideration on an individual range site basis during the development of these guides; to ensure crucial habitat needs as well as watershed needs were provided for. This involved extensive monitoring and clipping to determine plant community composition and production.

We agree that improvement in range condition is not always synonymous with improved wildlife habitat for any one particular species. However, improvement in ecological condition nearly always represents a more diverse, stable plant community. This contributes to watershed stabilization as well as an improvement in both the quantity and quality of forage produced. We believe improved diversity and vigor in a plant community generally does provide some benefits to the wildlife resource.

The allocation to livestock is based on a proper use factor by plant specie. The 50% allocation to livestock mentioned is the maximum by weight by specie that could be utilized under proper use conditions. This does not mean, as you suggest, that 50% of the total production could be removed annually by livestock. For some plants such as shrubby browse species, the proper use level for livestock may only be 10% and for many forbs, which are often particularly important to wildlife in their early stages, the factor may be as low as 0%.

This process is critical to the wildlife resource since much of their dietary, cover, and crucial wintering habitat needs are comprised of shrubby browse species, forbs and adequate residual grass stands. In the original survey from which the livestock AUMs were adjudicated, wildlife received an allocation based on a proper use factor by wildlife ungulates on individual plant species. If crucial wildlife habitats or riparian type habitat zones are identified within an allotment, the wildlife objectives were, and still are, to strive for maintenance of the areas, and over the long term, enhancement of them.

In the meantime, an intensive monitoring program will be maintained to assess the progress of the joint wildlife/range management objectives. In cases where additional forage production is documented in an allotment, increased livestock use would be authorized at a level compatible with the stated joint objectives on a temporary, nonrenewable basis. This will ensure the wildlife resource is not degraded by continuous use.

169.

The BLM does not mean to imply that increased water availability automatically equates with wildlife habitat expansion. Additional watering sources will be constructed so as to facilitate wildlife use only. The planned watering facilities will be used to expand chukar partridge, sage grouse and antelope habitats in the southernmost portion of the resource area. Their locations have been identified in areas where monitoring has indicated that water availability is the limiting factor. No yearlong water sources are located in a radius ranging from 1.5 miles to 3 miles from the sites selected.

We agree that livestock watering sources can lead to heavier livestock use in areas where they are located. This is why we require that the locations be determined jointly between the range and wildlife specialists to ensure no high value nesting habitat or crucial winter ranges are unduly degraded or disturbed by loss of residual vegetation or trampling of browse species. Another objective is to achieve a better distribution of livestock so areas which are heavily trampled and beaten out will have an opportunity to recover and establish a more desirable vegetative composition and structure for wildlife purposes.

In all instances, BLM requires that new water sources be modified for use by wildlife, either by fencing to protect upland vegetation, or by installation of alternate watering devices. We also contend some benefit is derived for wildlife by installation of any watering source.

170.

Refer to Response #289.

171.

A multidisciplinary team has reviewed the initial inventory data for all tracts of land in which you indicated a concern on behalf of the National Wildlife Federation. As a result, some changes have been made in the proposed recommendation. The recommendations and summary rationale are provided below.

In addition, prior to any disposal of land, either through sale or exchange, a site-specific environmental assessment must be completed which requires input from all resource specialists. The State Director Guidance issued June 16, 1983 (Instruction Memorandum MT-83-269) requires that the MDFWP be consulted on any proposed land transaction and requested to provide an analysis and comments.

The BLM's predominant method for land tenure adjustments is through exchange for lands with equal or greater resource and public values.

DEIS Recommended Land Status	Final RMP/EIS Recommended Land Status	Rationale
71-D Stillwater County	71-D Stillwater County	Has no legal access, small tract potential
24-D Sweet Grass County	24-D Sweet Grass County	
25-D	25-D	Both tracts have excellent exchange potential
20-D Yellowstone County	20-Fa Yellowstone County	Additional data is needed to make a final recommendation
3-F Yellowstone County	3-Ra Yellowstone County	
4-F	4-Ra	Provides habitat for upland game birds
69-D Yellowstone County	69-Fa Yellowstone County	
70-D	70-Fa	Additional data is needed to make a final recommendation
21-D Yellowstone County	21-D Yellowstone County	Has excellent exchange potential
23-D Yellowstone County	23-Ra Yellowstone County	Public access and habitat for mule and white-tailed deer
8-F Stillwater County	8-F Stillwater County	
9-F	9-F	Additional data is needed to make a final recommendation
65-D Yellowstone County	65-Fa Yellowstone County	Additional data is needed to make a final recommendation
42-D Stillwater County	42-D Stillwater County	Has excellent exchange potential
62-D Yellowstone County	62-Fa Yellowstone County	Additional data is needed to make a final recommendation
5-D Yellowstone County	5-D Yellowstone County	
6-D	6-D	Contiguous to lands proposed for subdivision
4-D Yellowstone County	4-D Yellowstone County	Has excellent exchange potential
5-F Yellowstone County	5-F Yellowstone County	Additional data is needed to make a final recommendation

172.

We refer you to 43 CFR 1610.4-9, which states in part, "After publication of the draft resource management plan and draft environmental impact statement the District Manager shall evaluate the comments received and select and recommend to the State Director, for supervisory review and publication, a proposed resource management plan and final environmental impact statement." All comments on the draft RMP/EIS are responded to and published in the final RMP/EIS. The District Manager utilizes these comments, whether by a single individual or groups, and according to their substance and validity, to evaluate and make any necessary changes in the final RMP/EIS. In addition, a 30-day protest period is provided after the date the Environmental Protection Agency publishes the notice of receipt of the final environmental impact statement containing the plan or amendment, in the *Federal Register*. For specific information on protest procedures, refer to 43 CFR 1610.5-2.

173.

The BLM believes that an excess program is necessary in 1983. The habitat management objectives of the three Federal agencies involved in the grazing of wild horses support this action.

Methodology for arriving at the target population is displayed on pages A-29 through A-31 of the draft RMP/EIS.

174.

The target population of 121 horses was determined after a systematic evaluation of the inventory data. The inventory was designed to assess the current condition and potential of the basic soil and vegetative resources. Additionally, the Bureau welcomed any production data offered to help minimize the subjectivity in determining a carrying capacity. Any adjustment from this figure will be supported by monitoring data.

There was above normal precipitation on the horse range in 1982. However, soil and climatic conditions are such that one year's precipitation is not going to produce drastic improvements in either production or vegetative species composition. Establishment of a target population must be based on projections of the normal situation and not short-term conditions brought about by ephemeral precipitation.

175.

Refer to Response #3.

176.

Refer to Response #4.

177.

Refer to Responses #4, #5 and #344.

178.

Refer to Response #9.

179.

Refer to Response #6.

180.

Refer to Response #10.

181.

The final RMP/EIS places stronger emphasis on the scattered land pattern in the Billings Resource Area.

182.

Refer to Response #3.

183.

The Little Belt Mountains are mentioned in the Geology and Topography section, Chapter 3, FEIS.

184.

The statements mentioned on pages 71 and 72 of the DEIS are in reference to the planting of crested wheatgrass which was used to stabilize the soil and not the overall purpose of the Bankhead-Jones Act.

185.

There are very few true riparian zones on BLM lands in the Billings Resource Area. However, there are several miles of intermittent streams and overflow areas that support woody vegetation. Often the streambed has eroded to a depth that the water is contained within the channel and there is very little, if any, overflow. In these areas, the banks usually support shrubby species such as snowberry, rosebrush, chokecherry and occasional buffalo berry. The intent is not to strive for a domination of these shrubby species over large areas, but to prescribe a grazing treatment that would achieve good or excellent condition on the surrounding sites, thus allowing the shrubs to become established and thrive where they are most ecologically suited. These areas normally only occupy a small proportion of a pasture and regardless of stocking rate, are often overused because of cattle concentrations. Therefore, the adjustment will likely be in season of use rather than numbers of livestock, and use will be authorized during fall or winter when the climate is such that livestock do not require as much shade and water.

186.

The Pryor Mountain WSA contains 16,927 acres while the portions of the Burnt Timber Canyon and Big Horn Tack-On WSAs recommended for wilderness are each less than 5,000 acres in size. The portion of the Burnt Timber Canyon unit recommended for wilderness consists of 3,430 acres and the southern portion of the Big Horn Tack-On is 2,550 acres in size. However, in conjunction with adjacent U.S. Forest Service and NPS areas which have been recommended for wilderness, the total area exceeds 40,000 acres. Rationale for recommending that the BLM study areas become components of the NWPS is provided in the Proposed Action for Wilderness, Chapter 2, FEIS.

187.

The small ranches considered here do have an average 191 AUM permit. (Table 3.23 contained incorrect information in the draft document and has been revised in Table 3.24 in the final RMP/EIS.) This table does not include the average of all BLM permits, but only those in the "I" and some of the "M" allotments where permits tend to be larger. In addition, some ranchers have more than one permit, so their total number of BLM AUMs would be larger than that for a single allotment.

188.

The BLM's role in wildlife habitat management has grown tremendously in the last decade. The programs' most significant boost came with the passage of FLPMA in 1976. This act formally recognized the wildlife program as one of the multiple use concerns to be addressed in all land use planning activities.

This act also authorized the appropriation of BLM monies specifically for the purpose of acquiring high value wildlife habitats, either in cooperation with other Federal and state agencies, or through BLM's land use planning process.

189.

The RMP supercedes the out-of-date 1973 management framework plan (MFP). The RMP does not advocate additional coal leasing in the Bull Mountains. It merely makes additional Federal coal available for further consideration for leasing as required in the Federal Coal Management regulations at 43 CFR 3420.1-4(e). The question of the need for additional coal leasing is addressed by the Regional Coal Team (RCT) and the Interior Department in later activity planning (43 CFR 3420.3). The major change that has occurred since 1973 has been the development and adoption of the Federal Coal Management Program, which followed major legislation (FCLAA, SMCRA and FLPMA).

190.

The final RMP has been changed to add some more discussion of the potential impacts from coal mining in response to this comment. The reader will note, however, that coal mining will not automatically result from this RMP. If there is sufficient interest by industry or the RCT in leasing at a later date, one or more Federal tracts may be analyzed in a regional coal leasing EIS. If those tracts eventually are leased, the operator must satisfy all state and Federal requirements before a mine plan would be approved. This involves an entirely new and separate EIS, prepared on that particular mine. Therefore, it is neither feasible nor appropriate to attempt to analyze in detail potential reclamation problems at the RMP stage. (See Chapter 1, Coal, for a more thorough discussion of the leasing process.)

191.

Refer to the Proposed Action section for Coal, Chapter 2, final EIS.

192.

As stated in 43 CFR 3461, the BLM has the option to carry forward areas to which the unsuitability criteria have not been fully applied until final lease sale EIS. This allows the BLM to further study these areas without precluding them from further consideration. Language has been added to the RMP clarifying which criteria were not completely applied due to inadequate data (see Appendices section). This data will be acquired as funding and manpower limitations permit.

193.

In response to this comment, a more thorough discussion of the multiple use trade-offs analysis has been clarified in the final RMP.

A map has been added to the final RMP showing areas acceptable for further consideration for coal leasing pending further study (see Coal Alternatives, Chapter 2, FEIS).

194.

Refer to Response #189.

195.

The RMP does not recommend or advocate that Federal coal be exchanged, except where it can be shown, on a case-by-case basis, that such an exchange would serve the public interest.

196.

Refer to Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

197.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

198.

Refer to Response #140.

199.

The first sentence refers to the wildlife input which must be included in all environmental assessments when surface disturbing activities are proposed. Wildlife management was not identified as an issue during the scoping process. Therefore, wildlife management activities were not analyzed any further in the DEIS. However, this section of the RMP has been rewritten to clarify BLM's wildlife program responsibilities in more detail. See Responsibilities Common to All Land Use Plan Alternatives, Chapter 1, FEIS, and the Appendices section, FEIS for results of unsuitability criteria application.

200.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

201.

The sentence on page 7 of the Draft has been reworded; also see Response #189.

202.

This paragraph has been rewritten. Refer to Response #193.

203.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

204.

The sentence referred to has been reworded to clarify that coal producers have, from time to time, informed BLM of their desire to lease Federal coal. This type of correspondence is ongoing and should not be confused with the "Call for Expressions of Interest" step in activity planning.

205.

Refer to Response #157.

206.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

In addition, the disposal and retention criteria in the Land Pattern Review and Adjustment Project Management Plan were incorporated into the State Director Guidance for Resource Management Planning in Montana and the Dakotas (April 1983) (see Appendices section, FEIS).

207.

The inventory for wildlife data and application of the unsuitability criteria is mandated by regulation, and must be accomplished prior to lease offering.

Refer to the Proposed Action section for Coal, Chapter 2, and Responsibilities Common to All Land Use Plan Alternatives, Chapter 1 in this document.

208.

This portion has been rewritten to clarify the fact that the entire section is a discussion of projected possible impacts from coal mining. This is done strictly for analysis purposes in comparing the possible outcomes of the various alternatives (refer to Response #190).

209.

In-place coal reserves were used to calculate coal amounts potentially available for mining. Actual recoverable reserves would depend on an individual mine plan. The analysis presented represents the BLM's "best estimate" about the possible impacts that might eventually stem from the decision to make 9,360 acres available for further consideration for surface coal leasing. This was in response to NEPA which required analysis of various alternatives. In response to this comment and others, this section and certain environmental consequences sections have been rewritten to incorporate more realistic time frames for potential development and for increasing their clarity.

210.

Refer to Responses #189 and #195.

211.

Refer to Response #193.

212.

In the case of AVFs, the final determination of unsuitability can be made up until the time of mine plan submission. Therefore, some areas preliminarily identified as AVFs are being carried forward.

See Response #192 for further clarification. As stated in 43 CFR 3461.3-1(2) requires the authorized officer to describe in the land use plans the results of the unsuitability applications along with any exceptions/exemptions. The actual process which was followed to arrive at various decisions is part of the Management Situation Analysis available in the Billings Resource Area Office.

Refer to Response #192.

213.

Because so much is yet unknown about future coal development in the area, the resource area staff attempted to leave management options open to "lease or exchange, pending further study". In the last paragraph on page 25 of the draft, the statement is made that "Coal exchanges would be considered *when it's in the public interest* to 'block up' Federal holdings."

Public interest determination is made for each exchange proposed in the activity planning stage in conjunction with the EA/LR.

214.

The High Level Management Alternative has been rewritten to clarify that all mandated workloads, which would include full application of the wildlife unsuitability criteria, would be accomplished prior to any lease offering. Refer to the High Level Management Alternative for Coal, Chapter 2, and Responsibilities Common to All Land Use Plan Alternatives, Chapter 1 in this document.

215.

In response to this comment, this section has been rewritten to clarify the fact that further studies and additional multiple use trade-off analysis are required prior to actual leasing (see High Level Management Alternative, Chapter 2, FEIS). Multiple use constraints have been applied by the EIS team to the extent possible using existing data.

216.

Proposals to exchange coal will be considered on a case-by-case basis. Each such proposal will be evaluated on its own merits.

217.

In the Declaration of Policy, Section 102 of FLPMA, Section 102(a)(12) states that:

"the public lands be managed in a manner which recognizes the nation's need for domestic sources of minerals . . ."

Moreover, Section 206(a) specifically states that "a tract of public land or interests therein may be disposed of by exchange . . . where the Secretary concerned determines that the public interest will be well served by making that exchange: Provided, That when considering public interest the Secretary concerned shall give full consideration to better Federal land management and the needs of State and local people, including needs for lands for the economy, community expansion, recreation areas, food, fiber, minerals and fish and wildlife . . ."

In addition to the FLPMA policy stated above, the BLM Montana State Director, in his State Director Guidance for Resource Management Planning in Montana and the Dakotas, April 1983, states the following:

"Consolidation of mineral estate—from the minerals program viewpoint this is probably the most important reason for acquisition of the mineral estate. The primary criteria would be consolidation of holdings into a more attractive developable package. A good example of this is the currently contemplated 'Meridian' exchange whereby checker-board ownership would be consolidated into two potentially mineable tracts. This also provides a leasable block of coal which is much more desirable to a potential developer."

218.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

219.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

220.

The BLM agrees that an explanation is needed as to why the Preferred Level Alternative was chosen for each of the issues identified in the draft RMP/EIS. Therefore, that rationale is provided under the "Proposed Action" in Chapter 2 of the final RMP/EIS.

221.

Table 2.5 has been amended to show a continuation of current production by emergency leasing.

With respect to displaying the unsuitability acreages, see Response #192.

222.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

223.

Emergency leasing would continue current production of the existing mine in the Bull Mountains. One and one-half acres would be disturbed per year for the 8 years of production allowed under an emergency lease. This section has been rewritten to reflect this disturbance (see High Level Management Alternative, Chapter 2, FEIS).

224.

The purpose for the summary in the draft RMP/EIS is to reveal the significant environmental consequences of the total land use alternative to each of the resources affected. An assessment of the potential impacts of coal leasing for each resource under the Low Level Management Alternative is found in Chapter 4 of both the draft and final RMP/EIS.

225.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

226.

Comments of the State Historic Preservation Officer on the draft RMP indicated a need to explain current BLM cultural resource management strategies more fully. Appended to the document is a section on BLM management of cultural resources which addresses mitigation of cultural sites. See also assumptions regarding cultural resources in Chapter 4.

227.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

228.

Refer to Response #220.

229.

Determination of the 61 cultural sites that may be impacted by the selection of the Preferred Level Management Alternative is derived from Table 3.11 on page 81 of the draft RMP/EIS.

A cultural resource inventory for the 10,040 acres carried forward suitable for leasing pending further study in the Bull Mountain Coal Field has been started, but was only 30% complete at the time the draft RMP was written. This inventory is required as part of the coal unsuitability criteria (#7) and will be completed prior to lease consideration by the Regional Coal Team.

230.

This has been corrected in Chapter 3, Air Quality, FEIS. A regional monitoring program was concluded in October 1982 resulting in the designation of Billings and Laurel as Class II areas.

231.

High industry interest could have been expected, given the quality of the coal in the Bull Mountains.

232.

Refer to Responses #195 and #204. In highly fluctuating economic conditions for energy development, Louisiana Land and Exploration found it uneconomical to mine underground. This should not be construed to mean that the coal is of insufficient value for future industry interest.

233.

The study referred to is entitled "Ground Water and Potential Coal Mining in the Bull Mountains of South Central Montana, by Keith Thompson, Open File Report Number MBMG-100". This study has been completed and will be printed in final form prior to November 1983. At that time, copies can be obtained upon request at either the BLM Montana State Office or the Montana Bureau of Mines and Geology. As we have stated previously, the BLM is not proposing to lease coal as a result of this document.

234.

The wildlife discussions referred to in Chapter 3 have been rewritten to specifically address the Bull Mountain coal field affected environment based on all Federal surface and subsurface ownership. The original habitat figures which were used and which are still included in the final RMP, addressed Federal surface acreage for the entire resource area. That is why the 170 figure for elk habitat appears small.

The environmental consequences section (Chapter 4) also includes a discussion of possible impacts as a result of Federal coal mining on all affected lands regardless of ownership.

235.

See the Appendices section in the FEIS for a summary of data available, and inventory needs for the wildlife related unsuitability criteria. These inventories are scheduled to begin in FY-84, contingent upon funding.

236.

As indicated on page 80 of the draft RMP/EIS, the visual resource inventory was completed for all of Musselshell County and a portion of Yellowstone County. This inventory did include the Bull Mountain coal fields. Approximately 50% of the Bull Mountain area was placed in a Class II designation while the remaining lands were placed in a Class IV designation.

This data, on a more detailed basis, is available for inspection at the Billings Resource Area.

237.

Estimates of cultural resource site densities were made from existing inventories (Lewistown District Class I Inventory) and from a survey of 30% of the acreage overlying Federal coal in the preferred alternative for the Bull Mountains. The BLM will complete the Bull Mountain cultural inventory as part of the full application of the unsuitability criteria.

238.

Refer to Response #150.

239.

The primary source for this statement is the RMP issues brochure. In addition to the brochure results, two surveys conducted in Musselshell and Carbon counties (John Short and Associates, 1978 and MT Energy MHD Research and Development Institute, Inc., 1979) provide

support for the statement. The issues brochure addressed coal development in general. Results did not specify who was to determine the need for coal. It also did not collect information specific to the Bull Mountains.

240.

This has been restated to read "The BLM personnel are aware that opposition to coal mining exists in the county. The exact extent of this opposition is not known. This is also true of support for coal mining." (See Issue Related Attitudes for Coal, Chapter 3, FEIS.)

241.

All comments (testimony from hearings, letters) received in response to the draft document have been published with a response in this document. It is presumed that all individuals who cared to respond to the draft, have responded.

242.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

243.

This sentence was misstated. It has been corrected in the final RMP/EIS to read: "The impact discussions in this chapter relate primarily to public lands, however, an assessment of impacts on adjacent state and privately-owned lands was also made." It was not the intent of the BLM to portray that impacts on local economies and uses of adjacent or nearby non-Federal lands and non-public land surface over Federally-owned mineral interests were not analyzed or addressed in this document. A description of the Social/Economic impacts of each alternative is contained in Chapter 4 of the draft RMP/EIS (see pages 123, 131-132, 139-144, 154-156, and 163-164, DEIS).

244.

Some of the unsuitability criteria have already been applied. All of the relevant criteria would be applied completely before an area could be considered within a final lease sale EIS. The assumption was rewritten to clarify this fact.

245.

This section has been rewritten to clarify the processes of impact identification, and mitigation required before mine plan approval. Restoration of the topography to approximate original contour is required by both the Federal and state legislation passed subsequent to the 1973 MFP. (See General Impacts for Soils/Watershed [Water Quality and Streambank Protection], Chapter 4, FEIS.)

246.

This section has been rewritten to clarify the potential impacts to groundwater. (See General Impacts for Soils/Watershed [Groundwater], Chapter 4, FEIS.)

247.

Total restoration of ponderosa pine habitat types has not been thoroughly studied and is not well documented in the literature. In the discussion of impacts and restoration, some assumptions relating to the time involved to regenerate a mature reproducing stand of ponderosa pine was used as the rationale for determining total restoration in the long term (25 years). However, as indicated on page 119 of the draft, total restoration of the disturbed areas may not be attained.

In the short term, and well into the long term, disturbed areas would see an increase in grass, forb and shrubby vegetative types which comprise the majority of elk and deer spring/summer dietary preference. It was on the basis of this analysis that BLM determined additional, desirable spring/summer range would be made available to these species.

Critical winter ranges for elk and deer will be recommended unsuitable for mining through application of criterion number 15. Nongame habitat would be destroyed through the duration of the mining activity.

The phrase, "more desirable habitats" has been replaced in the final RMP/EIS with "more socially tolerable habitats". It is anticipated that dislocation of wildlife created by mining activities will result in a reduction of numbers in all affected species. We anticipate their movement by any means natural to the species involved.

248.

The applicable Federal and state rules and regulations governing surface mining require a mining company to show that surface runoff will not degrade aquatic resources. If this cannot be demonstrated, a permit to mine is denied. Specific mitigation measures are addressed in a mine plan EIS required before a permit can be issued. These measures may take the form of sediment ponds, riprap, etc. Without a mine plan in hand, it is impossible to determine what mitigation methods would be suitable.

249.

The BLM has relatively small and scattered surface holdings in the Bull Mountain coal fields (Figures 3.3 and 3.5 of the draft RMP/EIS). Because of this ownership pattern, the overall impact of coal leasing for either underground or surface mining on recreation would be insignificant on public lands within the area. This is also true of the surrounding privately-owned lands. There are large expanses of publicly-owned lands administered by the BLM and U.S. Forest Service available for recreational purposes within a reasonable driving distance of the Bull Mountain area. Given this perspective, the overall impact to recreation would be minimal as stated on page 121 of the draft RMP/EIS.

250.

Impacts to cultural resources and visual resources from coal leasing are discussed in Chapter 4 of the draft RMP/EIS on the following pages:

Cultural Resources—pages 130, 138, 153 and 162

Visual Resources—pages 129, 138, 152 and 161

251.

The impacts are minimal and localized to the actual mined area. What impacts do occur are being mitigated by the approved mining plan under which the company is operating.

252.

See General Impact Section on page 116 of the draft RMP/EIS.

253.

Refer to Low Level impacts to Vegetation by coal, as rewritten in Chapter 4, FEIS.

254.

The 357 acres relates to maximum production potential anticipated over the 25 year long-term production. The BLM projects a maximum potential disturbance of approximately 18 acres per year at peak production levels. See page 25, paragraph 9 of the draft RMP for additional explanation.

Offsite impacts to wildlife cannot be reliably quantified until access roads and other surface appurtenances are located during the mine plan stage. Until the exact acreage to be mined is identified, it is impossible to determine, with any specificity, the affect on migration routes. However, it is reasonable to assume that such impacts are likely to occur and that they must be addressed during the mine plan stage.

Please refer to the Appendices section for a summary of wildlife data available, and inventory needs in order to apply the unsuitability criteria #9-15.

255.

The BLM cannot, and will not, eliminate any steps in the planning and leasing process. There is, however, some latitude in determining to what extent various other resources and concerns will be allowed to impact the coal resource. This portion of the document has been rewritten to clarify this point. (See Low Level Alternative, Attitudes Toward the Alternative, Chapter 4, FEIS.)

256.

Refer to Response #150.

257.

Refer to Response #255.

258.

Current budget restrictions and a compressed time schedule did not allow a color-coded map of each of the four alternatives. However, it is anticipated that such maps will be provided in the record of decision scheduled for completion in FY-84.

259.

Rationale for recommending the Twin Coulee WSA as non-suitable for wilderness designation is provided in the Proposed Action section for Wilderness, Chapter 2 of the FEIS.

260.

Refer to Response #259.

261.

The BLM's preferred level of management for wilderness has been modified. (Refer to the Proposed Action for Wilderness for changes and rationale, Chapter 2, FEIS.)

262.

Response #273 addresses both the potential for joint agency management and the possibility of consolidation of lands within the Pryor Mountain WSAs.

263.

Refer to Response #261.

264.

Refer to Response #15.

265.

There are no plans for disposing of the BLM lands adjacent to Big Lake. We are working with the MDFWP to develop the waterfowl potential on BLM lands and the newly acquired state lands. In fiscal years 1983 and 1984, we intend to develop nesting islands, initiate the planting of dense nesting cover and install approximately 15 goose nesting platforms.

We have also proposed that the area be considered as a future site for investment of monies transferred to BLM by Ducks Unlimited specifically for development of high potential waterfowl areas.

266.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

267.

Refer to Response #112.

268.

Refer to Response #15.

269.

Persons leasing public land may not bar access to the public if public access exists. Therefore, another type of solution would need to be discussed.

270.

By their very nature, public lands must be managed for the public good. Free use is authorized under certain conditions. However, in almost all cases, use of the public land by a private individual for economic gain without just compensation by that user would not be considered in the public interest.

271.

All tracts of BLM land within the resource area having river frontage or displaying a riparian type of vegetative cover have received the highest priority for retention from a renewable resource standpoint. We recognize the wildlife habitat and recreational values of such lands and have not proposed that any of these tracts be considered for disposal.

272.

Rationale for recommending the Twin Coulee WSA as non-suitable for wilderness designation is provided in the Proposed Action section, Chapter 2 of the FEIS.

273.

Because the BLM, NPS and Forest Service are at different stages in the wilderness review process, and none of the public lands in the Pryor Mountains have been designated as wilderness, a coordinated wilderness management plan is premature. Based on comments submitted by the NPS and members of the public, the BLM has modified its recommendation for the 2,550 acre southern segment of the Big Horn Tack-On.

Wilderness management roles and responsibilities between the three Federal agencies represented in the Pryor Mountains will be decided at a later date if and when Congress decides to designate wilderness in the area.

The State of Montana and the BLM have indicated a willingness to exchange lands where public benefits would accrue. The state has recently expressed an interest in possible exchange of the school trust lands in the Pryor Mountains for other BLM administered lands.

274.

There are three parcels of public land adjacent to the City of Billings in the South Hills. Because of the values we have identified, two of the parcels have been placed in the retention category, while the third has been put in the "further study" category. Public land with significant recreational values and wildlife habitat will be retained.

275.

Refer to Response #168.

276.

Refer to Responses #159 and #165.

277.

Wildlife habitat condition ratings have not been completed on an allotment-by-allotment basis. Areas referred to as crucial habitat or habitats requiring special management attention are mapped on overlays and are available for inspection at the Billings Resource Area Office. Refer to Response #160 for an explanation of the approach to be used in updating and developing new allotment management plans. This is a coordinated process between the range and wildlife staffs to meet joint objectives. This process requires that problems or conflicts be dealt with on an individual allotment basis.

Our initial assessment of problem areas was done through the allotment categorization process. An explanation of the categories and their meaning can be found on page 11 of the DEIS. Resource conflicts (including wildlife) played a key role in the assignment of allotment categories. This process is dynamic and will allow BLM the flexibility to change an allotment's category at any time as we identify problem areas or areas reach anticipated levels of improvement.

In addition, site-specific wildlife habitat problem areas were not brought to our attention in the scoping issue identification, criteria development or alternative development by interested publics.

278.

Methods and treatments considered are displayed in Table 2.2 on page 13 of the DEIS. Methodology for grazing management is displayed in Appendices 4.1 and 4.2 of the DEIS.

The increase in AUMs is calculated by subtracting the current authorized AUMs from the total AUMs produced by improving ecological range condition. Therefore, the more acres in fair or poor condition that have the capability to respond to either grazing treatments or vegetative manipulation, the larger the potential increase in AUMs.

See Responses #145 and #168.

279.

The allotment categorization (selective management) approach was designed to focus management efforts and funding to the allotments with the greatest need. The "I" allotments will receive first priority for the limited funds. The current budget is adequate to implement the planned actions on the "I" allotments. If increased funds are available, the project work identified for "M" and "C" allotments can be done.

The Billings Resource Area currently receives about \$60,000 annually in range improvement funds. Over the 8 year implementation period, this would total \$480,000 of which about \$400,000 would actually be spent on projects with the remainder spent on project survey and design and contract preparation.

Table 2.2, pages 12 and 13 of the DEIS, show range improvements by management category which were considered in arriving at the cost of the High Level Alternative. As can be seen from this table, a substantial number of improvements were considered for "M" category allotments with a minor amount on "C" allotments. Costs of the various range improvements are shown on page A-27 of the draft. The cost of range improvements in "I" allotments totals \$538,550. The cooperating ranchers would bear about \$150,000 of this cost, mainly in fence construction and contributed labor and equipment on sagebrush burning, chiseling and crested wheatgrass renovation projects.

280.

Economic forecasts were provided in the preferred alternative where it was possible to do so. For example,

see the draft RMP/EIS, page 35, paragraph 14 for estimated costs for wild horse management, Appendix 2.2 and page 30 for grazing management costs and page 36, paragraph 11 for wildlife improvement costs. It is not feasible at this time to provide cost estimates for all issue areas. For example, until specific access locations are determined, it is impossible to determine, even in a general sense, costs associated with providing recreational access. Costs associated with the coal, oil and gas, ORV and timber management programs are programmed as part of base program operational costs on an annual basis.

281.

Refer to Response #168.

282.

Refer to Responses #159 and #160.

283.

See Wildlife Assumptions section, Chapter 4, FEIS.

284.

Refer to Response #289.

285.

Refer to the Proposed Action for Wilderness for rationale on why the Twin Coulee WSA was not recommended for wilderness designation.

286.

Refer to Response #15.

287.

Refer to Response #159.

288.

Refer to Response #168.

289.

The Billings Resource Area wildlife program does not advocate timber harvest as a means to enhance wildlife habitats. We do, however, realize that small (most cuts in this resource area average 30 acres or less), carefully planned timber harvest programs can provide benefits to the wildlife resource by providing a more diverse vegetative community through an increase in forb and browse species production.

The preferred alternative proposes that approximately 70 MBF of timber be harvested annually. This would disturb approximately 30 acres. The only areas in the resource area which are being considered lie along the southeastern portion of the Little Snowy Mountains and on parcels of public land south of Big Timber, Montana. These areas were identified because they display a very dense overstory or are infested by the spruce budworm.

All cuts are carefully planned jointly by the timber and wildlife specialists. This ensures that no clear-cuts are allowed, and that no known crucial wintering or thermal cover areas are affected.

The objective of the wildlife specialists' input is to provide small, irregularly shaped areas where forb and browse species production can be increased to provide additional forage for deer, elk and turkey. Some nongame species could also be expected to inhabit the newly created habitat. Species favoring old growth or decadent timber stands would be displaced, but not in significant numbers.

290.

Refer to Response #155.

291.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

292.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

293.

Refer to Response #15.

294.

Refer to Response #156.

295.

Refer to Response #112.

296.

As noted in the Appendix on Cultural Resource Management and in the Assumptions section to Chapter 4 of this document, BLM evaluates sites for the National Register of Historic Places using criteria set forth in 36 CFR 60.6. The BLM will pursue nomination of sites which qualify to the Register when their proper management requires full nomination and as time and funds permit. Effective management of some properties may be more efficiently accomplished through the "determination of eligibility" process. Both nominations and determinations are completed in consultation with State Historic Preservation Officer (SHPO).

297.

Estimates of human and financial resources required to implement cultural resource support of issues under each alternative are not provided in the RMP. Cultural resource compliance work in support of another activity such as range improvement is funded by the range program. Cost of this support is included in estimates for costs of range improvements, etc.

298.

Specific information is not provided about how the identification and evaluation of Billings Resource Area cultural properties will occur in a timely manner under each alternative. Scheduling these actions relative to other BLM undertakings is addressed in 36 CFR 800 and memoranda of agreement between the BLM and the Advisory Council on Historic Preservation.

299.

"Unaffected portions" of the resource area we interpret to mean public lands which are not likely to be impacted by surface disturbing activities resulting from BLM initiated or BLM authorized undertakings. Under the Cultural Resource Management Program, BLM conducts limited surveys for cultural resources on a continuing basis as time and funds permit in compliance with Section 110 of the National Historic Preservation Act of 1966 as amended. These inventories are directed to areas where prior data indicates a possible need for active resource management to protect important sites (see Appendix 4.7).

300.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

301.

Refer to Response #15.

302.

Refer to Responses #159, #160 and #165.

303.

The BLM feels that a 90 day review period is ample time for an adequate review of an EIS. "Ninety days shall be provided for review of the draft plan and draft environmental impact statement," states 43 CFR 1610.2(e). "The 90-day period shall begin when the Environmental Protection Agency publishes a notice of the filing of the draft environmental impact statement in the *Federal Register*." That notice was published April 15, 1983 and expired on July 15, 1983.

304.

Refer to Response #15. In addition, the amount of land listed in the disposal category that will actually be disposed of is not known at this time. Site-specific analysis has not as yet been done, and until such analysis is complete and shows a definite public benefit from disposal of a parcel of public land, disposal cannot take place. Exchange will be the preferred method of disposal as stated in the Proposed Action Section for Land Tenure Adjustment in this document.

The BLM has modified its recommendation for seven parcels of land in the Land Tenure Adjustment Area based on public comment (see Response #171).

305.

Refer to Response #155.

306.

Refer to Response #391.

307.

The BLM has recommended that the entire Pryor Mountain WSA and major portions of the Burnt Timber Canyon and Big Horn Tack-On WSUs be designated components of the NWPS (refer to Proposed Action for Wilderness in Chapter 2, FEIS for rationale for not recommending wilderness designation for the Twin Coulee WSA).

308.

Additional analyses and language have been included in the final RMP which addresses these general concerns.

309.

The BLM feels that the land use planning stage is not the appropriate time to "consider all aspects of both leasing and exchange." We are only making Federal coal available for further consideration for leasing or exchange. The activity planning stage (regional EIS for coal leasing), in full consultation with the Powder River RCT, is a more appropriate focus for full consideration of leasing and/or exchange.

310.

No lands have been designated as unsuitable for the surface mining of mineral materials other than coal. Each application for the purchase or free-use of mineral materials will be assessed on a case-by-case basis. Appropriate stipulations would be developed to mitigate adverse impacts to sensitive resource values. Some areas have been designated as sensitive to mineral leasing where special stipulations may be applied during the lease application process (see "Areas Sensitive to Oil and Gas" Overlay in Map Pocket, FEIS).

311.

These changes have been made in the final RMP/EIS.

312.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

313.

Refer to Response #310.

314.

Under the Existing Management Alternative, BLM would not consider exchanges except for those which are legislatively mandated (for example, an AVF exchange where privately-owned coal has been precluded from mining because of an AVF designation). Only emergency coal leases would be issued to maintain present production levels. By regulation (43 CFR 3425.1-4) any area leased must be mined as part of an existing operation. The final RMP/EIS has been changed to clarify this statement and a map has been added to show the location of the existing Federal lease which would qualify for an emergency lease (see Existing Management Alternative, Chapter 2, FEIS).

315.

The analysis presented in the draft RMP represents BLM's "best estimate" of the possible impacts which might eventually occur from the decision to make coal available for further consideration for coal leasing for either underground or surface mining. This is in response to NEPA which requires analysis of various alternatives. Some additional analyses has also been added to the final RMP/EIS.

316.

Maps depicting areas acceptable for further consideration pending further study have been prepared (see Chapter 2, final RMP/EIS).

Only areas considered to be of high or moderate development potential are included in these figures. The BLM has eliminated most lands for which qualified surface owners were opposed to surface coal leasing.

All of the Federal coal within the boundaries of the Joliet-Fromberg and Bear Creek Fields is of high or moderate development potential for underground mining. The BLM has received no expressions of interest for coal from the Silvertip, Stillwater or Bridger Fields.

317.

The "... (no) changes in the existing public land pattern ..." recommendation on page 29 of the draft concerns surface rights only. Coal exchanges can, in most cases, be consummated without changes in the surface ownership.

318.

This section has been rewritten to clarify the management alternative. A map has been added to illustrate those areas found acceptable for further consideration pending further study. The BLM will continue to program for inventory monies to gather the necessary data for completion of unsuitability criteria application. (See Coal Alternatives, Chapter 2, FEIS.)

319.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

320.

If a lease tract is delineated in the Bull Mountains for competitive leasing, the RCT will consider it in relation to other tracts that may be delineated. Environmental, economic and social impacts, mitigation of these impacts and the coal resource will be addressed, and the tracts selected and scheduled accordingly.

321.

These statements have been corrected in the final RMP/EIS.

322.

See Response #315 and also Chapters 2 and 4 of the final RMP/EIS for clarifying language requested in your comment.

323.

As in the past, mineral prospecting, exploration and development will be permitted. These operations will only be restricted when they conflict with sensitive resource values. Conflicts will be resolved through site-specific environmental assessments. The RMP was not intended to replace the need for these analyses.

324.

The 70,000 acres subject to special leasing stipulations were identified in the footnote to Table 2.5 on page 41 of the DEIS. These areas were identified as "sensitive" in the Lewistown District *Programmatic Oil and Gas EA*. In response to this comment, the areas have been indicated on a map overlay provided with this final EIS, and further identified in the Appendices section.

325.

The BLM is a multiple use agency. As such, all resource development activities are permitted except where important resource values would be adversely affected. Areas of conflict were determined during impact analysis, when the proposed actions under each alternative (Table 2.5 of the DEIS) were displayed against existing resource values. The results were discussed in Chapter 4.

326.

BLM recognized in the RMP that exploration and development of energy and mineral resources was important. Access for these activities generally has been, and will continue to be provided. Opportunities to explore for locatable minerals has been expanded. Areas sensitive to oil and gas leasing have been identified (see Overlay for Sensitive Areas in Map Pocket, final RMP/EIS), and appropriate stipulations developed to protect these areas. Oil and gas exploration and development may not be compatible with the objectives of the PMWHR. Here exploration may be severely restricted. Site-specific assessment may result in a recommendation for no surface occupancy for portions of a lease application area. In critical parts of the horse range, the recommendation may be to not lease those areas at all.

327.

1. The BLM has provided for mineral resource development on public lands.
2. Lands having mineral potential were identified. Sources of information include known producing areas, geologic inference and industry input. Maps which display this potential in greater detail are available in the Billings Resource Area Office.

Access will be maintained to areas of known or inferred mineral potential.

3. The BLM has identified lands having sensitive resource values where mineral exploration may be restricted or constrained (see Sensitive Areas Overlay in Map Pocket of final RMP/EIS). These areas are the approximately 70,000 acres identified on page 41 and the 50 acres identified on page 37 of the draft RMP/EIS.

328.

The effects of each alternative to energy and other mineral resources is discussed in the Environmental Consequences section (Chapter 4) of the draft and final RMP/EIS.

329.

Refer to Response #323.

330.

Portions of the final RMP/EIS have been rewritten to further clarify BLM's compliance with FLPMA and NEPA.

331.

Refer to Response #325.

332.

Refer to Response #323.

333.

Refer to Response #324.

334.

Refer to Response #327.

335.

It is true that designated wilderness areas will be withdrawn from mineral appropriation, subject to valid existing rights. This withdrawal would have a minimal effect in the Pryor Mountain area, since investigations by the BLM and U.S. Geological Survey (USGS) have concluded that bentonite is the only known mineral deposit within the wilderness study areas which may be economically developed in the near future. From the size and tenor of the known uranium/vanadium deposits in the Pryor Mountain WSA and WSUs, the BLM has inferred that, should further mineralized zones be discovered, they could not be economically developed. The deposits would be too small and remote. There is moderate potential for the discovery of minable quantities of bentonite in the southern portion of the Pryor Mountain WSA (MT-067-206).

Within the Twin Coulee WSA, there are no known mineral deposits other than limestone. The Heath formation "oil" and metalliferous shales lie south of the WSA. The potential for discovery of a valuable mineral deposit within the area is very low. At any rate, BLM is not recommending wilderness designation for this area.

The BLM relies upon the U.S. Bureau of Mines to project trends in market conditions. It would be extremely difficult to accurately predict demand for a mineral resource 100 years in the future.

336.

Only the Pryor Mountain WSA contains mining claims. Since these claims were located before the passage of FLPMA, the claimant may impair wilderness suitability if necessary within the claim areas. The energy mineral potential for all wilderness study areas and units is considered low, however.

337.

The *Federal Register* of December 31, 1982 listed those areas that did not contain 5,000 acres of public land and had been improperly identified as WSAs as defined in Section 603 of FLPMA.

The Solicitor's Opinion on which the decision to not designate areas of less than 5,000 acres as WSAs, went further, however. The Solicitor stated that the BLM was within its authority to study areas of less than 5,000 acres with identified wilderness values under the resource planning authority of Section 202 of FLPMA. Both Burnt Timber Canyon and the Big Horn Tack-On were properly recommended for wilderness study based on wilderness resource values identified during the inventory phase of the wilderness review.

Special authorization was obtained by the Montana State BLM Director to conduct wilderness studies for specific areas of less than 5,000 acres. These areas were believed to contain important wilderness values and could be managed as wilderness in conjunction with other Federal agency wilderness lands. The authority under which these areas were to be studied and a listing of affected study units was published in the *Federal Register* of Tuesday, May 10, 1983; Volume 48, No. 91, pages 21000-21002.

338.

Refer to Response #2.

339.

Exploration and development of mineral resources are recognized as important uses of public lands within the Billings Resource Area. Resource management plans are issue-driven documents; oil and gas exploration and development were not addressed as issues except within the PMWHR and other specified "sensitive" areas. Geothermal resource development was not considered feasible in this area.

Locatable minerals exploration and development are also considered issues only within the PMWHR, where these activities are presently prohibited (subject to valid existing rights) through mineral segregations which became effective in 1968 and 1970.

340.

In all "sensitive" areas, additional stipulations may be attached to oil and gas leases prior to their issuance. These stipulations may restrict exploration, but would not prohibit it. Outside of this approximately 70,000 acres, oil and gas would be leased with standard stipulations. Only within the PMWHR may the No Leasing option be exercised. The potential for discovery of commercial quantities of oil or gas within the horse range is considered low.

The Proposed Action recommends that only 50 acres remain segregated against mineral location. The remaining 28,536 acres would be reopened to exploration.

A mineral segregation affecting almost 2,000 acres along the southern boundary of the horse range became effective in 1980. The mineral character for this area was examined in 1978, and found to be nil. The mineral development potential was reexamined this year; it remains low for all commodities except bentonite, which has moderate development potential.

Mineral exploration would be administered through the 43 CFR 3809 (surface management) regulations. Operations would be restricted only if they would result in unnecessary or undue degradation of the surface.

341.

Refer to Response #3.

342.

The BLM, as the lead agency for management of the horse range, has the responsibility to control horse numbers at a level that will not contribute to the degradation of the basic soil and vegetative resource. The BLM is also accountable to other agencies (Forest Service, NPS, State of Montana) as well as private landowners within the area used by the horses to ensure that these conditions are being met. Due to the confined nature of this population, roundups "every few years" would very likely contribute to a further decline in vegetative conditions. This is supported in the order establishing the PMWHR signed by Secretary of the Interior, Stewart L. Udall on September 9, 1968, which states in part 4 . . .

"The Bureau of Land Management, for the public lands within the Range, and in cooperation with the National Park Service within the National Recreation Area, will develop and keep current a management plan for the Range which will provide for the management of the wild horses and their habitat within a balanced program which considers all public values and without impairment of the productivity of the land."

343.

Refer to Response #4. In addition, attention will have to be given to the younger female age classes.

344.

The proposal in the Preferred Alternative was to relocate horses or groups of horses from overpopulated herd areas to areas where there is additional forage available. The objective is to keep horse numbers in balance with the forage produced rather than promote selective breeding.

345.

Refer to Response #5.

346.

Refer to Response #342.

347.

Refer to Response #6.

348.

Refer to Response #9.

349.

Refer to Response #9.

350.

Refer to Response #11.

351.

Alternatives in this RMP assess the general, potential environmental impacts of leasing additional coal in the Bull Mountains so as to meet regional rather than just local energy needs. The Powder River RCT addresses future energy demands and makes available Federal tracts to help meet these demands. The RCT will use the RMP to decide whether coal in the Bull Mountains should help supply the forecasted demand. One or more tracts may be delineated from the area classified as suitable for further consideration pending further study by this RMP.

352.

It is true that the Bull Mountains, and many other portions of eastern Montana, are fragile, and difficult to revegetate. Unless a mining company was able to demonstrate a reasonable probability that it could reclaim the land, it would not obtain a permit to mine.

Springs and seeps in the Bulls do fluctuate. The Montana Bureau of Mines and Geology preliminary report on the groundwater in the Bull Mountains suggests that the effects of coal mining upon aquifers would be small and localized. Springs and seeps in undisturbed areas above the coal would be unaffected, if not connected with the coal aquifer.

353.

The Montana Bureau of Mines and Geology has issued a preliminary report (Thompson, 1982) which suggests that groundwater effects of surface mining would probably be localized (coal mining could lower water quantities and quality of wells in the vicinity of the mine). Springs or seeps from perched aquifers above a coal mine would be unaffected.

354.

The BLM has listened to resident opposition to coal leasing. A substantial portion of the Bull Mountain Field has been eliminated from further consideration for this reason. As our wildlife and cultural resource studies are completed, more lands may be eliminated.

355.

A stated objective for land tenure adjustment is to adjust the public land pattern in order to increase public access and improve recreational opportunities and wildlife habitat.

356.

Refer to Response #15.

357.

Refer to Response #156.

358.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

359.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

360.

Refer to Response #15.

361.

Refer to Response #65.

362.

Refer to Response #156.

363.

Refer to Response #15.

364.

Refer to Response #65.

365.

Refer to Response #159.

366.

Refer to Response #169.

367.

Refer to Responses #160 and #168.

368.

Refer to Response #15.

369.

Refer to Response #167.

370.

The BLM has identified, in the Proposed Action section in Chapter 2 of the final RMP/EIS, those areas in which the public has expressed an interest in obtaining needed access. As a practical matter, however, ingress and egress will have to be negotiated with adjacent landowners. The BLM has also identified public lands which might be used as exchange candidates to obtain needed access (see Appendices section on Land Tenure Proposal Tracts, FEIS).

371.

The fees charged for grazing privileges and other resource uses, are set by Congress and are beyond the scope of this plan.

372.

Public access to the BLM lands described in this letter is currently available by floating the Yellowstone River. Overland access is not available and members of the public have indicated that it would be desirable to obtain such access. However, such access would have to be negotiated with adjacent landowners.

373.

Refer to Response #15.

374.

Refer to Response #156.

375.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

376.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

377.

Refer to Response #15.

378.

Refer to Response #156.

379.

Refer to Response #381.

380.

Refer to Response #44.

381.

The BLM will consider underground mining in the Bull Mountains as well as surface mining. No state mining permits would be issued unless a company was able to demonstrate a certainty that disturbed areas could be adequately reclaimed to the standards established by the state and Federal governments. The RMP encourages underground mining at the expense of surface mining in the Bulls.

382.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

383.

Refer to Response #65.

384.

Refer to Response #388.

385.

Refer to Response #44.

386.

Refer to Response #156.

387.

Refer to the Proposed Action for Land Tenure Adjustment in Chapter 2, FEIS.

388.

Generally, water wells in the central part of the Bull Mountains are deeper than wells in the northern portion. The sandstone aquifers here generally produce only small quantities of water.

A preliminary report by the Montana Bureau of Mines and Geology (Thompson, 1982) concluded that coal mining would affect groundwater supplies near mined areas. Water levels in wells could decline, but by state regulation, replacement sources of groundwater must be obtainable by the responsible mining company at their

expense to replace sources that have been altered sufficiently to preclude current usage. If this isn't possible, mining will not occur.

389.

No mining could occur unless a company obtained a state mining permit. This permit would specify that the lands be reclaimed and returned to production. Please see Chapter 1, Coal, for a further explanation of the process involved.

390.

The BLM is not proposing to lease and mine coal with this document. However, we are attempting to determine what areas could be carried forward for further leasing consideration. The questions asked here could only be answered by an EIS document dealing with a specific mine plan proposal.

391.

User conflicts with adjacent homeowners in the South Hills area are well recognized by the BLM. In response, BLM has closed a 70 acre area adjacent to the existing housing subdivision and has proposed closing the remaining 1,200 acre area to 4-wheeled vehicle use (refer to the Proposed Action for ORV Use, Chapter 2, FEIS). However, the 1,200 acre area would remain open to ORV use by motorcyclists in deference to public demand.

392.

At the present time, ORV use is not restricted to the Ah-Nei Environmental Education area. The BLM recognizes that problems do exist and has recommended ORV use restrictions in the Proposed Action for ORV Use in Chapter 2 of the the final RMP/EIS. Enforcement of restrictions will be dependent upon available funds and manpower. However, the BLM does not anticipate being able to fund a full-time enforcement officer.